

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 KEVIN FORDHAM,

a/k/a "Spaghetti,"

D-2 MARTIN MURFF,

a/k/a "P," "Marty,"

D-3 TAMAR WATKINS,

a/k/a "Spoonie,"

D-4 TERRY DOUGLAS,

a/k/a "Drama,"

D-5 EDDIE REID,

a/k/a "Twellve," "Lahabb,"

D-6 GREGORY JOHNSON,

a/k/a "DJ," "Sincere,"

D-7 SPOONIE JOHNSON,

a/k/a "Richard Simms," "Kaos,"

D-8 KURTEIZ THOMPSON,

a/k/a "Teiz,"

D-9 JAVON WILHITE,

a/k/a "Oddball,"

D-10 SCHUYLER BELEW JR.,

a/k/a "Dro,"

D-11 DAVUN BASKERVILLE,

a/k/a "Von,"

D-12 GARY PORTER,

a/k/a "Midget,"

Violations: 18 U.S.C. § 2

18 U.S.C. § 922(g)

18 U.S.C. § 924(c)

18 U.S.C. § 1959(a)

18 U.S.C. § 1962(d)

18 U.S.C. § 3147

21 U.S.C. § 841(a)

21 U.S.C. § 846

Case:2:21-cr-20354

Judge: Borman, Paul D.

MJ: Patti, Anthony P.

Filed: 05-26-2021 At 04:00 PM

INDI USA V. SEALED MATTER (DA)

D-13 LAWON CARTER,
a/k/a "C-Flame,"
D-14 ANTHONY REYNOLDS,
a/k/a "Montana,"
D-15 JAYLIN MCNEAL,
a/k/a "Smoov,"
D-16 ANTHONY NAJERA,
a/k/a "Tweezy,"
D-17 NAUJEH CARTER,
a/k/a "Blow,"
D-18 TYRONE FISHER,
a/k/a "King,"
D-19 FABIAN TOODLE,
a/k/a "Noodles,"
D-20 EARNEST LEE,
a/k/a "E Lee,"
D-21 DELAINO EPPENGER,
a/k/a "Ace,"
D-22 DEVAN TURNER-BANKHEAD,
a/k/a "Turn,"
D-23 ANGELO HOPSON,
a/k/a "Lo,"
D-24 BRANDON THOMAS,
a/k/a "Boss Hogg,"
D-25 KENNETH JOHNSON,
a/k/a "LB,"
D-26 WINISFORD WATKINS,
a/k/a "C4,"
D-27 ANTHONY SIMMONS,
a/k/a "Twon,"
D-28 ANTHONY ZIGLER,
a/k/a "Footz," "Vampire,"
D-29 SHELTON CARTER,
a/k/a "S-Dot,"

D-30 ARTISE JOHNSON,
a/k/a "Out Kold,"
D-31 DWAYNE PARLER,
a/k/a "Wadee,"
D-32 LATEEF MOORE,
D-33 CHARLES DOUGLAS,
a/k/a "Chuckles,"
D-34 JOHN JOHNSON,
a/k/a "AU,"
D-35 ZANIE TALIAFERRO,
a/k/a "Zane,"
D-36 ANTIONE COLEMAN,
a/k/a "Shaq,"
D-37 HARITH HUNTER,
a/k/a "Reef,"
D-38 ONDROME LEWIS,
a/k/a "Red,"
D-39 RASEAN WALKER,
D-40 DARRYL TAYLOR,
a/k/a "Chosen,"

Defendants.

INDICTMENT

The Grand Jury charges:

COUNT 1
Racketeering Conspiracy
18 U.S.C. § 1962(d)

D-1 KEVIN FORDHAM,
D-2 MARTIN MURFF,
D-3 TAMAR WATKINS,

D-4 TERRY DOUGLAS,
D-5 EDDIE REID,
D-6 GREGORY JOHNSON,
D-7 SPOONIE JOHNSON,
D-8 KURTEIZ THOMPSON,
D-9 JAVON WILHITE,
D-10 SCHUYLER BELEW JR.,
D-11 DAVUN BASKERVILLE,
D-12 GARY PORTER,
D-13 LAWON CARTER,
D-14 ANTHONY REYNOLDS,
D-15 JAYLIN MCNEAL,
D-16 ANTHONY NAJERA,
D-17 NAUJEH CARTER,
D-18 TYRONE FISHER,
D-19 FABIAN TOODLE,
D-20 EARNEST LEE,
D-21 DELAINO EPPENGER,
D-22 DEVAN TURNER-BANKHEAD,
D-23 ANGELO HOPSON,
D-24 BRANDON THOMAS,
D-25 KENNETH JOHNSON,
D-26 WINISFORD WATKINS,
D-27 ANTHONY SIMMONS,

Background

At all times relevant to the Indictment:

1. The Almighty Vice Lord Nation (hereinafter referred to as “AVLN” or “Vice Lords”) is a national gang founded in Chicago, Illinois in the 1960s. There are various “branches” within the AVLN,

as well as subsections of those branches known as “decks.” The different AVLN branches are expected to assist one another, collaborate with one another on criminal activities, and answer to the gang’s leaders in Chicago, Illinois, and Detroit, Michigan. Chicago is considered the “Holy Land” for the AVLN, and the Michigan AVLN leaders report and answer to the Chicago AVLN leaders. Some of these branches are the Travelling Vice Lords (“TVL”), Insane Vice Lords (“IVL”), Mafia Insane Vice Lords (“MIVLs”), Cicero Insane Vice Lords (“CIVLs”), and the Conservative Vice Lords (“CVLs”).

2. The Vice Lords have a hierarchical chain of command. There are “Kings” and “Princes” that rule the Vice Lords. Kings are the founders of the specific branch and are to be respected and honored by all branches within the AVLN. “Universal Elites” run the specific decks within an area or city. These Universal Elites are ranked as five and three stars, and only the leaders of a particular branch can appoint this rank. Each star represents how much “work,” or

criminal activity, a member puts in for his or her branch. A member can receive up to five stars, which is referred to as a “glove.” Certain branches, including the TVLs, MIVLs, IVLs, CIVLs, and CVLs, also have “Branch Elites,” who can also have five or three stars. A Branch Elite’s authority is restricted to his branch, and his functions include assuring the overall effectiveness of his branch. A Branch Elite can be viewed as a trouble shooter for his branch. There are also “Enforcers,” who enact orders of the Universal Elites by directing “Lieutenants” to maintain discipline within a particular branch by administering beatings or fines. The “Chief Enforcer” is required to adhere to and enforce all commands sent down to him to administer. There are “Ministers of Literature,” who maintain and distribute AVLN teachings and rules of conduct. This literature is often referred to as the “75.” There are also “Ministers of Command,” who ensure that AVLN members follow the chain of command and through whom orders are passed. There are “Secretaries,” who keep records of which members attend gang meetings, referred to as the

“Gathering of Almighty Vice Lords” (“goals”), dues payments, membership, and rank. Other AVLN members are known as “soldiers,” “foot soldiers,” “representatives,” or “ones.”

3. The various Michigan branches of the AVLN take guidance and direction from the Michigan “Board,” which is comprised of the leadership from each of the recognized AVLN branches, including the IVLs, TVLs, MIVLs, CVLs, and CIVLs. The Board has overall decision-making authority for the AVLN in Michigan. The Board approves membership rank, authorizes the sanctioning of members who are in violation of AVLN rules, including “Key 21” (orders to kill), and mediates when issues arise between branches.

4. The Insane branches, including the MIVLs, IVLs, and CIVLs, also have a national board, known as “Al Shabazz” or “El Shabazz,” which includes the highest-ranking members of the Insane branches throughout the country. The Al Shabazz Board is organized out of Chicago, Illinois.

5. AVLN members must follow orders from AVLN leaders.

These orders include attending mandatory meetings, or “goals,” and contributing membership dues. AVLN leaders also order members to participate in violence including, but not limited to, retaliating against rival gangs or AVLN members who have cooperated with law enforcement, ordering assaults of AVLN members that are in violation of AVLN law, and directing AVLN members to commit other crimes and acts of violence on behalf of the AVLN. AVLN members swear a “code of silence,” where they promise never to divulge AVLN business. Members agree to “9 Codes of Honor,” which require, among other things, a code of silence, a willingness to kill or be killed for the AVLN, and a promise to maintain unity between all AVLN members.

6. Individuals enter the AVLN by either being “blessed in,” that is by reciting an oath or prayer and being approved of by a high-ranking member, or by being “beat in,” that is by being “circled up”

by other AVLN members who then physically assault the new member.

7. The organization utilizes defined membership criteria and rules. These rules are commonly referred to as “literature” or the “75.” Members must know their literature, which includes the principles and commandments of the AVLN.

8. The AVLN also has rules requiring attendance at meetings, the payment of dues, and assisting fellow members in crimes and acts of violence, if so ordered. Only Branch Elites and “reps” are required to attend regular “goals.” Leaders, however, are required to attend “universal goals,” which are meetings where only members with Universal-Elite status are allowed to attend.

9. The AVLN has 22 by-laws, which include, among other things, duties to honor the AVLN and the code of silence, to follow the chain of command, to participate in all AVLN acts, to pay monthly dues, to aid in the advancement of all AVLN enterprises, and to be recognized as a soldier of the AVLN until death. Anyone

found in violation of AVLN law is subject to disciplinary actions. The AVLN imposes punishment upon members, generally referred to as “violations,” which can include physical beatings, such as “mouth shots,” “chest shots,” or “circle ups,” for violation of these rules. Specifically, an act of treason is punishable by no less than a life of misery or death.

10. The AVLN utilizes a variety of unifying marks, manners, and identifiers, including gang signs, clothing, and tattoos, that are specific to the organization. A common symbol of the AVLN is the five-pointed star, which represents the fact that the Vice Lords belong to the “People Nation,” an alliance of various street gangs including the Bloods, the Latin Kings, and Latin Counts. This alliance is in direct conflict with the “Folk Nation,” an alliance of various street gangs including the Gangster Disciples and the Crips. Many of the AVLN symbols, clothing, and sayings attempt to differentiate themselves from or disrespect their rivals. Other common AVLN symbols include a top hat and cane, the “Playboy”

bunny, and the numbers “22 and 12,” which represent the 22nd and 12th letters of the alphabet, V (22) and L (12). The AVLN colors are predominately black and gold, although red is also incorporated to show their participation in the People Nation. The AVLN also uses common greetings and sayings to identify their allegiance to the gang, such as “Almighty,” “All is Well,” “Palms Up,” “Truly,” “A.V.L.N,” “Beloved,” and “55.” Each branch also has specific sayings for their branch. For example, the TVLs use “solid,” and the MIVLs use “64.”

11. Despite the various branches, the AVLN identifies itself as “last name first,” which means that a member is first and foremost a member of the AVLN, and secondarily, a member of his or her respective branch. This is also part of AVLN law. For example, “Key 14” of AVLN literature states, “no matter what’s in front of VL [Vice Lord] they are always Vice Lord first.” This symbolizes that the different branches within the AVLN must come together and operate as one when called upon. Gang members are always expected to

exhibit AVLN unity. The various AVLN branches are expected to assist one another, collaborate with one another on criminal activities, and answer to the gang's leaders in Chicago, Illinois, and Michigan. AVLN literature prohibits "clicking," where gang members only relate to, and show love and respect for, members of their same branch or from the same geographic location, neighborhood, or side of town.

12. AVLN literature requires that "All lords will adhere to and enforce the Chain of Command at all times!" and "If One Member Fights, We All Fight[.]" Additionally, "it is the unspoken obligation of every VL to defend himself [and] every other VL to the extent of giving their life[,] if necessary" and "[i]f any VL is attacked[,] it is the sworn duty of every VL to overcome his attacker by whatever means necessary."

13. AVLN members must obtain authorization from AVLN leadership before engaging in fights with other gang members. AVLN literature provides, "[N]o representative of the Almighty Vice

Lord Nation is ever [to] fight with another representative unless it is authorized by someone with the authority to do so." It is a violation of AVLN law if any AVLN member takes it upon himself to fight with another AVLN representative.

14. Branch leaders must also be available to assist another branch. For example, one of the AVLN's 22 Universal Laws states, "The Chiefs of each branch must at all times have a way to communicate with each other. This is to ensure the readiness and alertness if assistance is needed by another branch[.]"

15. AVLN literature requires extreme violence when retaliating on behalf of the gang. The AVLN's "Concepts of War" provides that "[t]he injuries that you inflict upon an enemy should be considered such a vicious act of terrorism, which the damaged inflicted, cause the enemy to never consider revenge."

16. Vice Lords are prohibited from speaking to outsiders about the Vice Lords or from cooperating with law enforcement. According

to AVLN literature, engaging in such activities will result in a member being violated, which includes physical assaults up to death.

17. All members of the AVLN are expected to remain members for life. Attempts to leave or withdraw from the Vice Lords can result in a “beat out,” which is a physical beating by multiple Vice Lords members. Those who are in violation of AVLN laws and attempt to leave the gang are subject to a “green light” or “21,” which are orders to kill.

18. Although different branches fall under the AVLN, disputes and rivalries arise between some of the respective branches, including disputes about the recruitment of members between branches, as well as power struggles between branch leadership.

19. The AVLN participates in drug trafficking involving fentanyl, cocaine, cocaine base, heroin, ecstasy/MDMA, methamphetamine, prescription pills, and marijuana. Based on their involvement in the gang, AVLN members enjoy connections to drug suppliers and utilize an interstate network to facilitate drug

trafficking, including obtaining drugs from Chicago and trafficking drugs out of state.

20. Another benefit of AVLN membership is protection. AVLN members carry, possess, and use firearms to protect drug sales. Members are sometimes assigned to provide security and to protect other members who are engaged in drug trafficking. AVLN members also carry, possess, and use firearms to protect both themselves and other AVLN members.

21. AVLN members often carry firearms, and provide, share, or sell firearms to other gang members. Vice Lords commit crimes with these firearms, including shootings and armed robberies.

22. The AVLN maintains a strong presence within the prison system of the Michigan Department of Corrections (“MDOC”). Incarcerated AVLN members benefit from their membership in the AVLN by maximizing their numbers and increasing security when disputes with rival gangs emerge. Incarcerated members take

direction from AVLN leaders both inside and out of prison, who, in turn, take direction from leaders in Chicago and Michigan.

23. Incarcerated members are required to provide proof of their membership and good standing in the AVLN. Members in violation of AVLN rules can be subjected to assaults by fellow members or lose their protected status as AVLN members. At the direction of AVLN leadership, incarcerated members will assault or carry out “Key 21” or “green lights” (kill orders) against other inmates, both within the gang or against rival gang members.

24. AVLN members monitor and verify the status of inmates who claim AVLN membership. If an inmate falsely claims AVLN membership, or if an AVLN member is found to be claiming a false rank, that results in a violation. Depending on the severity of the violation, the inmate can be physically assaulted or subject to a “Key 21” or “green light” (kill orders).

25. Incarcerated AVLN members will sometimes receive financial support from non-incarcerated members. The source of this

financial support is often derived from the dues collected at AVLN meetings.

26. AVLN members use cell phones and other electronic devices to communicate with one another, to plan specific acts of violence and other crimes, to discuss past criminal activity, and to coordinate drug trafficking. AVLN members have a strong presence on social media by using Facebook, Facebook live, Instagram, and other social media platforms. They frequently post photos with other gang members, wearing gang member paraphernalia, and using gang terminology.

The Enterprise

27. At all times relevant to this Count of the Indictment, in the Eastern District of Michigan, and elsewhere, the AVLN, including its leadership, members, and associates, constituted an enterprise, as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, that was engaged in, and the activities of which affected, interstate and foreign commerce. The

enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. At various times relevant to this Indictment,

KEVIN FORDHAM,
MARTIN MURFF,
TAMAR WATKINS,
TERRY DOUGLAS,
EDDIE REID,
GREGORY JOHNSON,
SPOONIE JOHNSON,
KURTEIZ THOMPSON,
JAVON WILHITE,
SCHUYLER BELEW JR.,
DAVUN BASKERVILLE,
GARY PORTER,
LAWON CARTER,
ANTHONY REYNOLDS,
JAYLIN MCNEAL,
ANTHONY NAJERA,
NAUJEH CARTER,
TYRONE FISHER,
FABIAN TOODLE,
EARNEST LEE,
DELAINO EPPENGER,
DEVAN TURNER-BANKHEAD,
ANGELO HOPSON,
BRANDON THOMAS,
KENNETH JOHNSON,
WINISFORD WATKINS,

ANTHONY SIMMONS,
ANTHONY ZIGLER,
SHELTON CARTER,
ARTISE JOHNSON,

and others, were members and associates of the AVLN.

28. In addition to being a member of the enterprise:

a. KEVIN FORDHAM serves as the leader of the Vice Lords for the State of Michigan and holds the rank of "Prince" for the IVLs.

KEVIN FORDHAM also sits on the Al Shabazz Board as well as the Michigan Board.

b. MARTIN MURFF serves as the "Prince" for the nationwide MIVL branch and as a leader in Chicago, Illinois. MARTIN MURFF also sits on the Al Shabazz Board.

c. TAMAR WATKINS serves as a Five-Star Universal Elite, as a leader of the TVL branch in Chicago, Illinois, and as an adviser to the Michigan TVL Chiefs.

d. TERRY DOUGLAS serves as a Five-Star Universal Elite and Chief of the TVL branch in Michigan. TERRY DOUGLAS also sits on the Michigan Board.

e. EDDIE REID serves as a Five-Star Universal Elite and the Chief of the MIVL branch in Michigan. EDDIE REID also sits on the Michigan Board.

f. GREGORY JOHNSON serves as a Five-Star Universal Elite and the Chief of the CIVL branch in Michigan. GREGORY JOHNSON also sits on the Michigan Board.

g. SPOONIE JOHNSON serves as a Five-Star Universal Elite and a leader of the TVL branch in Michigan. SPOONIE JOHNSON is also a member of the Michigan Board.

h. KURTEIZ THOMPSON serves as a Three-Star Universal Elite in the IVL branch, and is the creator and leader of the 9 Squad Deck. KURTEIZ THOMPSON also sits on the Michigan Board.

i. JOVAN WILHITE serves as a Five-Star Universal Elite for the TVL branch and is a Chief for the TVLs for the State of Michigan.

j. SCHUYLER BELEW JR. serves as a Three-Star Universal Elite and is a leader of the TVL branch in Michigan.

k. DAVON BASKERVILLE is a member of the TVL branch in Michigan and is the Chief Enforcer for the TVLs.

l. GARY PORTER is a member of the TVL branch in Michigan.

m. LAWON CARTER serves as a Branch Elite for the TVL branch in Michigan.

n. ANTHONY REYNOLDS serves as a Five-Star Branch Elite.

He was a member of the UVL branch in Michigan and is now “rotating” with the TVL branch in Michigan.

o. JAYLIN MCNEAL is the Chief Enforcer for the TVLs in Michigan.

p. ANTHONY NAJERA is a TVL member claiming the rank of Five-Star Universal Elite. NAJERA has been leading TERRY DOUGLAS's deck since DOUGLAS has been incarcerated.

q. NAUJEH CARTER serves as a Three-Star Branch Elite for the TVL branch in Michigan.

r. TYRONE FISHER is an associate of the Vice Lords and an Enforcer for the TVL branch in Michigan.

- s. FABIAN TOODLE is a Chief of the TVL branch in Michigan.
- t. EARNEST LEE is a ranking MIVL member in Chicago, Illinois.
- u. DELAINO EPPENGER serves as a Three-Star Universal Elite and is a leader of the MIVL branch in Michigan.
- v. DEVAN TURNER-BANKHEAD serves as a Five-Star Branch Elite and is a leader of the MIVL branch in Michigan.
- w. ANGELO HOPSON is an MIVL member in Chicago, Illinois.
- x. BRANDON THOMAS serves as the Chief Enforcer for the IVL branch in Michigan and as the National President for the Phantom's Motorcycle Club ("PMC"), which is affiliated with the AVLN. Many PMC members are also Vice Lord members, and PMC members must also be Vice Lord members in order to have a leadership rank in the PMC. The PMC and the AVLN also share common identification marks on their clothing and other paraphernalia, among other things.

y. KENNETH JOHNSON serves as a Three-Star Universal Elite and is a leader of the IVL branch in Michigan.

z. WINISFORD WATKINS serves as a Five-Star Branch Elite and Chief Enforcer for the IVL branch in Michigan and is a member of the Phantom's Motorcycle Club.

aa. ANTHONY SIMMONS serves as a Five-Star Branch Elite and Minister of Command. He is a leader of the CVL branch in Michigan.

bb. ANTHONY ZIGLER is a member of the CVL branch in Michigan.

cc. SHELTON CARTER is a member of the IVL branch in Michigan.

dd. ARTISE JOHNSON serves as a Five-Star Branch Elite and Minister of Command. He is a leader of the IVL branch in Michigan.

Purposes of the Enterprise

29. The purposes of the enterprise include the following:

- a. Maximizing profits for enterprise leaders and members from the sale of controlled substances and other criminal activity;
- b. Preserving and protecting the power, territory, and profits of the enterprise using intimidation and violence including, assaults, threats of violence, and possession of weapons, including firearms;
- c. Promoting and enhancing the enterprise and its members' and associates' activities;
- d. Providing protection and financial support for incarcerated members;
- e. Keeping victims in fear of the enterprise and in fear of its members and associates through threats of violence and acts of violence; and
- f. Threatening violence for individuals who cooperate with law enforcement.

Manner and Means of the Enterprise

30. The manner and means used by the enterprise to further the goals of the enterprise and to achieve its purpose included, but was not limited to, the following:

- a. Members of the enterprise were expected to learn and abide by the rules of the enterprise;
- b. Members of the enterprise held meetings in which they would discuss, among other things: the structure and organization of the gang; past acts of violence and other crimes committed by gang members against rival gang members and others; gang members who were arrested or incarcerated; discipline measures to be taken against gang members who violated gang rules; collection of money to use to aid fellow members; plans and agreements regarding the commission of future crimes, including murder, shootings, robberies, distribution of controlled substances, illegal

possession of firearms, and assault, as well as ways to conceal these crimes; and reinforcement of gang rules;

c. Members of the enterprise purchased, maintained, and circulated firearms, or agreed that other enterprise members would possess firearms, for use in criminal activity by members and associates;

d. Members of the enterprise committed, or agreed that other enterprise members would commit certain acts of violence, including murder, attempted murder, assaults with intent to commit murder, assaults with dangerous weapons, and robberies, and the distribution of controlled substances, to protect and expand the enterprise's criminal operations;

e. Members of the enterprise used cellular telephones, mobile devices, and computers to communicate about enterprise activities and to keep members informed about ongoing enterprise activities;

- f. Members of the enterprise used internet-based social networking sites to communicate with each other and to promote the enterprise's criminal activities, including distribution of controlled substances;
- g. Members of the enterprise promoted a climate of fear through violence and threats of violence; and
- h. Members of the enterprise committed, or agreed that other gang members would commit, the distribution of controlled substances, the proceeds of which were used to benefit the enterprise and its members.

The Racketeering Conspiracy

31. Beginning on a date unknown to the Grand Jury, but starting no later than 2012, and continuing to the date of this Indictment, in the Eastern District of Michigan, and elsewhere, the defendants,

KEVIN FORDHAM,
MARTIN MURFF,
TAMAR WATKINS,
TERRY DOUGLAS,

EDDIE REID,
GREGORY JOHNSON,
SPOONIE JOHNSON,
KURTEIZ THOMPSON,
JAVON WILHITE,
SCHUYLER BELEW JR.,
DAVUN BASKERVILLE,
GARY PORTER,
LAWON CARTER,
ANTHONY REYNOLDS,
JAYLIN MCNEAL,
ANTHONY NAJERA,
NAUJEH CARTER,
TYRONE FISHER,
FABIAN TOODLE,
EARNEST LEE,
DELAINO EPPENGER,
DEVAN TURNER-BANKHEAD,
ANGELO HOPSON,
BRANDON THOMAS,
KENNETH JOHNSON,
WINISFORD WATKINS,
and ANTHONY SIMMONS,

along with others known and unknown to the Grand Jury, being persons employed by and associated with the AVLN enterprise, described more fully in paragraphs 1-30 above, which was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed with one another to violate Title 18, United States Code, Section 1962(c), the defendants agreed to conduct and participate directly and indirectly, in the conduct of the affairs of said enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), consisting of:

a. Multiple threats and acts involving:

- i. Murder, in violation of Michigan Compiled Laws Sections 750.316, 750.317, 750.83, 750.157a, and 767.39;
- ii. Robbery, in violation of Michigan Compiled Laws Sections 750.529, 750.530, 750.88, 750.89, 750.157a, and 767.39;

- iii. Extortion, in violation of Michigan Compiled Laws Sections 750.213, 750.157a, 750.92, and 767.39; and
- b. Multiple acts indictable under the following provisions of federal law, that is Title 18:
 - i. Section 1951 (relating to interference with commerce, robbery, or extortion);
 - ii. Section 1952 (relating to racketeering);
 - iii. Section 1512 (relating to tampering with a witness, victim, or an informant);
 - iv. Section 1513 (relating to retaliating against a witness, victim, or an informant); and
- c. Multiple offenses involving drug trafficking in violation of Title 21, United States Code, Sections 841, 843, and 846.

32. It was part of the conspiracy that defendants,

KEVIN FORDHAM,
MARTIN MURFF,
TAMAR WATKINS,
TERRY DOUGLAS,
EDDIE REID,
GREGORY JOHNSON,

SPOONIE JOHNSON,
KURTEIZ THOMPSON,
JAVON WILHITE,
SCHUYLER BELEW JR.,
DAVUN BASKERVILLE,
GARY PORTER,
LAWON CARTER,
ANTHONY REYNOLDS,
JAYLIN MCNEAL,
ANTHONY NAJERA,
NAUJEH CARTER,
TYRONE FISHER,
FABIAN TOODLE,
EARNEST LEE,
DELAINO EPPENGER,
DEVAN TURNER-BANKHEAD,
ANGELO HOPSON,
BRANDON THOMAS,
KENNETH JOHNSON,
WINISFORD WATKINS,
and ANTHONY SIMMONS,

and others known and unknown to the Grand Jury, each agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Overt Acts

1. On or about November 11, 2012, during a recorded call, an AVLN member and associate explained that the former IVL

leader put KEVIN FORDHAM in charge of the IVL branch for the State of Michigan.

2. On or about April 6, 2013, during a recorded call, a TVL member explained that KEVIN FORDHAM was supposed to be the Prince for the IVLs.
3. On or about September 23, 2013, DELAINO EPPENGER and other AVLN members and associates participated in an armed robbery at the direction of an AVLN leader.
4. On or about December 29, 2013, during a recorded call, GREGORY JOHNSON explained that he has been a Vice Lord member “since '92,” and that “I gave my life for this, bro.”
5. On or about June 3, 2014, during a recorded call, KEVIN FORDHAM explained that certain IVL members keep him informed about AVLN business within the MDOC.
6. On or about August 23, 2014, during a recorded call, KURTEIZ THOMPSON identified himself as “Lord Teiz” and explained that he was under “P,” an unindicted AVLN member and

associate, who blessed his deck, the 9 Squad, which stands for “Insane, Supreme, Quality, under Almighty Deck.”

7. On or about September 29, 2014, ANTHONY REYNOLDS committed an unarmed robbery.
8. On a November 10, 2014 recorded call, GREGORY JOHNSON discussed the Vice Lords, explaining that “this is what I live and die for.”
9. On or about April 14, 2014, during a recorded call, KURTEIZ THOMPSON said that he received his “marching orders” from a higher-ranked IVL member, and stated, “I'll shoot one of these n----, ya feel me. N---- already know how it is.”
10. On or about May 7, 2015, AVLN members and associates fired shots into the home of V.T. and S.T., two former AVLN members who cooperated with federal law enforcement.
11. On or about January 21, 2016, during a recorded call, ANTHONY SIMMONS discussed F.S. arriving at his MDOC

facility with an AVLN leader. The AVLN leader said that he would check with “the body” and let SIMMONS known what F.S.’s status was within the AVLN. On or about January 22, 2016, an AVLN inmate called an AVLN leader, explaining that he was calling for “Twon” [ANTHONY SIMMONS], and asked whether the shirt was green or red. The AVLN leader stated, “that’s all gas no brakes man.” On or about January 27, 2016, ANTHONY SIMMONS stabbed F.S.

12. On or about January 23, 2016, FORDHAM posted on Facebook that his name was “Amir Museeb Elshabazz aka Ghetti” and he has “5 of them [five stars] for Single I [IVLs].” He stated that he was “blessed by Sad, Booney, Lo, Min, Marty [MARTIN MURFF], Draper at the same time with Mohammed approval Mustafa Akbar call me his lil brother.” He also explained to another Facebook user, “the board of Elshabazz I have a seat there.”

13. On or about April 24, 2016, J.J. suffered lacerations to the head after being assaulted by an AVLN member or associate. On or about February 28, 2019, during a recorded call, TERRY DOUGLAS discussed having arranged for a prisoner, J.J., to be stabbed in the face in the past.

14. On or about June 15, 2016, a Facebook user asked FORDHAM, "...who do I go to to (sic) get approval to build a righteous demo for Texas." FORDHAM responded, "Bro you got my approval I'm a chief elite you have my blessings."

15. On or about June 23, 2016, during a recorded call, SPOONIE JOHNSON advised an AVLN member and associate that "Ghetti [KEVIN FORDHAM] got it for the mit [Michigan]."

16. On or about July 23, 2016, in a Facebook group chat, EDDIE REID discussed MIVL rankings with several individuals. REID questioned the individuals and their rank. REID explained, "I'm telling you and whoever you with are not mafia and y'all to end that or I'll find y'all and end it for you."

One individual asked if REID was threatening him. REID responded, "No i don't know what that word is but i ganruntee (sic) you you won't like the results at all." REID stated, "You have until the time i get back home to disband this bullshit and you have 7hrs and trust me it won't be hard to track down your Ip address to locate if you cherish your life you do so immediately."

17. On or about July 28, 2016, during a recorded call, SPOONIE JOHNSON stated that he was the top-ranking non-incarcerated TVL in Michigan, and held the rank of 3 Star Universal Elite.

18. On or about September 24, 2016, during a recorded call, an IVL member talked about "Hen" [H.S.] with TERRY DOUGLAS and another IVL inmate. During the call, the IVL member explained that H.S. was a "Key 21" [order to kill]. DOUGLAS responded, "Yep. That's all I needed to know." The IVL member explained that the "Key 21" order came from "the

I[VL]s, T[VLs], everywhere[,]” and that the IVL member went to the “Board” and the “Board” said to “Key 21 that brother.” On or about October 17, 2016, H.S. was stabbed by AVLN members and associates. On or about February 24, 2019, during a recorded call, TERRY DOUGLAS admitted to KENNETH JOHNSON that “you know, I had Hen [H.S.] stabbed, bro.” TERRY DOUGLAS also said that he has H.S.’s paperwork, too. On or about February 28, 2019, during a recorded call, TERRY DOUGLAS again admitted to assaulting H.S.

19. On or about September 26, 2016, during a recorded call, SPOONIE JOHNSON explained that FABIAN TOODLE was promoted to Universal Elite status.

20. On or about October 26, 2016, FORDHAM posted on Facebook, “Im a have to reprogram the body [AVLN] of Michigan on law coc [chain of command].”

21. On or about November 1, 2016, during a recorded call, an AVLN member and associate explained that there was an

AVLN "Board" and that "Ghetti" [KEVIN FORDHAM] is the head of the Board in Michigan.

22. On or about December 1, 2016, JOHN JOHNSON possessed marijuana and approximately 4.5 grams of cocaine hydrochloride in SPOONIE JOHNSON's car.
23. On or about December 21, 2016, on Facebook, SPOONIE JOHNSON stated that he was the Chief of the TVLs in Michigan, and was looking for more members.
24. On or about January 16, 2017, KEVIN FORDHAM posted on Facebook, "...trying to bring all the houses [AVLN branches] together here."
25. On or about January 27, 2017, during a recorded call, KENNETH JOHNSON explained that he has been a member of the Vice Lords for 12 years.
26. On or about March 13, 2017, during a recorded call, SPOONIE JOHNSON discussed how the police impounded his car because JOHN JOHNSON was sitting in the vehicle while

possessing a "half ounce of dope, pills...ounce of weed bagged up in dime bags."

27. On or about March 14, 2017, during a Facebook conversation with an AVLN member and associate, EDDIE REID discussed the leadership of the MIVL, and how KEVIN FORDHAM and MARTIN MURFF gave REID his leadership position.

28. On or about March 29, 2017, EDDIE REID posted a photograph of a deceased AVLN member and associate. KEVIN FORDHAM commented on the photo, discussing AVLN unity and issues about AVLN members claiming their individual branch over the AVLN as a whole, and explaining, "From this day forward ones will be held accountable for the fuckery and that's across the board no matter what branch now try me. I leave you as I came, Vice Lord from the house of Insanity standing on #14."

29. On or about March 30, 2017, on Facebook, KEVIN FORDHAM stated “. . . we got to get all schools [AVLN branches] on one accord beloved because we can't VL [Vice Lord] by ourselves. . .” EDDIE REID responded, “Alright I'm with it.....Just let me know.”

30. On or about April 12, 2017, DELAINO EPPENGER posted to Facebook about his affiliation with the MIVL.

31. On or about June 30, 2017, during a recorded call, an AVLN member and associate discussed how KEVIN FORDHAM used to sell drugs for the AVLN member and that he used to drop off “zippers” for the “750” or 8 balls.

32. On or about July 17, 2017, during a recorded call, ANTHONY ZIGLER contacted a CVL leader, stating that he wanted to “21 this brotha ‘Nitty” [F.W.]. On or about July 27, 2017, ANTHONY ZIGLER stabbed F.W. On or about July 6, 2020, during a recorded call, an AVLN member and associate discussed with KENNETH JOHNSON how he obtained

KENNETH JOHNSON's approval of the Key 21 kill order that led to F.W.'s stabbing.

33. On or about July 29, 2017, KEVIN FORDHAM posted to Facebook, "I'm the CE [Chief Enforcer] of the entire 9 22 12 [nationwide IVL] house."

34. On or about August 13, 2017, during a recorded call, an IVL member explained that KEVIN FORDHAM sent him paperwork describing how the AVLN was supposed to "run" in every MDOC facility.

35. On or about August 16, 2017, EDDIE REID posted on Facebook that, "I'm a [King] Troy Martin Guy!!!! I'm proud Rep of this 6*4 [MIVL] nation I'm reppin KT til Death I am not part of no 60-40 64 is what i am..."

36. D.J. was assaulted on or about August 14, 2017, by an AVLN member or associate. On or about February 28, 2019, during a recorded call, TERRY DOUGLAS stated that he had

arranged for the assault of D.J., a fellow prisoner, by another AVLN member and associate. On or about March 9, 2019, during a recorded call, TERRY DOUGLAS stated that he had arranged for the assault of D.J., a fellow prisoner, by another AVLN member and associate. On or about May 3, 2019, during a recorded call, TERRY DOUGLAS again stated that he had arranged for the assault of D.J., a fellow prisoner, by another AVLN member and associate. On or about September 17, 2019, during a recorded call, TERRY DOUGLAS again admitted that he had arranged for the assault of D.J., a fellow prisoner, by another AVLN member and associate.

37. On or about August 18, 2017, during a recorded call, DELAINO EPPENGER discussed EDDIE REID's leadership of the MIVLs as a "glove," and how the new "P[rince]" is Marty [MARTIN MURFF].

38. On or about August 25, 2017, during a recorded call, KEVIN FORDHAM told an AVLN member and associate to shut down an unsanctioned IVL deck. KEVIN FORDHAM explained, "Tell [him]... that I said shut that shit down. Teiz [KURTEIZ THOMPSON] ain't got shit since he can only answer to Pete [an unindicted AVLN member and associate]. I'm the muthafucking King."

39. On or about September 8, 2017, during a recorded call, KEVIN FORDHAM told an IVL inmate, "You got that compound, you run that shit, so you already know what it is." KEVIN FORDHAM then stated, "They either get in tune or get tuned up, that's it."

40. On or about September 8, 2017, an AVLN member and associate asked EDDIE REID if he had talked to the "P" [Prince MARTIN MURFF] today. REID asked the AVLN member to provide the contact information for "Marty the M" [MARTIN MURFF].

41. On or about September 17, 2017, during a recorded call, an AVLN member and associate referred to KEVIN FORDHAM as the “Chief of Chiefs” from Michigan to Mississippi.
42. On or about September 30, 2017, during a recorded call, KURTEIZ THOMPSON explained that he “blessed” “four bros” with “a half a pound a piece on the cookie [marijuana] tip so ones, ya know, can get it up.”
43. On or about October 15, 2017, during a recorded call, an IVL member explained that KEVIN FORDHAM was “top dawg[.]” The IVL member also explained that “Mr. T [an unindicted AVLN member and associate]” started the IVLs in Michigan, and after receiving a 35-year federal sentence, the AVLN member and associate passed it down to KEVIN FORDHAM.
44. On or about October 16, 2017, KEVIN FORDHAM posted on Facebook, “me I’m Chief.”

45. On or about October 22, 2017, on a recorded call, DELAINO EPPENGER told an AVLN member and associate, “Ya know I got three of them things [stars] too now...I got the whole eastside.”

46. On or about October 24, 2017, SCHUYLER BELEW JR. possessed cocaine inside a vehicle with FABIAN TOODLE.

47. On or about December 21, 2017, during a recorded call, KURTEIZ THOMPSON explained that he was on the “Board for the I[VL]s.” THOMPSON also stated that they had a “universal goal” last month and that was when THOMPSON was put on the “Board” and is supposed to handle everyone coming home from prison. THOMPSON explained that he was still the “Chief.”

48. On or about January 7, 2018, during a recorded call, KURTEIZ THOMPSON told ARTISE JOHNSON that he created the 9 Squad Deck on or about March 8, 2014, but September 19th is their celebration day.

49. On or about January 20, 2018, during a recorded call, KURTEIZ THOMPSON said that KEVIN FORDHAM was the “P” [Prince] of the IVLs. THOMPSON also discussed with an AVLN member and associate that an IVL member was falsely claiming rank. THOMPSON said that if this member tells anyone he has status, to “blow him up.” THOMPSON explained that those were FORDHAM’s words. The AVLN inmate told THOMPSON that he forgot how this “goes” and that THOMPSON was “reckless as hell.” Then both the inmate and THOMPSON stated, “99 [police in area].”

50. On or about February 4, 2018, during a recorded call, an IVL member stated that FORDHAM “calls world-wide” for the “9s” [IVLs].

51. On or about February 18, 2018, EDDIE REID discussed a female MIVL member and associate posting a status update, stating that she was leaving the MIVLs. REID ordered several

members to attend a meeting the following day because "Marty [MARTIN MURFF] called for it."

52. On or about February 21, 2018, during a recorded call, two AVLN members and associates discussed how all the AVLN branches were under one banner, and that everyone was just "AVLN."

53. On or about March 19, 2018, BRANDON THOMAS and two AVLN members and associates attempted to extort K.M. for money and his motorcycle.

54. On or about April 19, 2018, during a recorded call, two AVLN members and associates discussed that GREGORY JOHNSON was selling heroin, cocaine, and marijuana. One of the AVLN members stated that he still has GREGORY JOHNSON's number.

55. On or about April 19, 2018, during a recorded call, DAVUN BASKERVILLE and an AVLN member and associate

discussed how K.N. “snitched.” During the call, DAVUN BASKERVILLE stated, “Tell him and Dro [SCHUYLER BELEW JR.] to get together and blow down on dog [K.N.].” DAVUN BASKERVILLE also discussed how he needs to get back to the streets because K.N. caused a federal indictment against the TVLs and K.N. was out now. On or about April 1, 2020, K.N. was shot.

56. On or about April 26, 2018, on a recorded call, DELAINO EPPENGER stated that he had been promoted and he is “calling it” for the city. EPPENGER stated that he used to only have the “eastside.” But “[t]his bitch mine now bro, the whole city is mine.” An AVLN member and associate asked, “Where I stand at?” EPPENGER responded that the AVLN member is his “MOJ [Minister of Justice] . . . you my right hand.” EPPENGER stated that “Twelvve” [REID] gave him the “green light” to pass on the status. EPPENGER said that he is calling people and telling them if they are anywhere in Michigan they

got to get “in tune” with him because “Detroit is the Headquarters.”

57. On or about May 2, 2018, EDDIE REID posted on a photo of REID and MARTIN MURFF on Facebook, stating, “On straight Mobb shit with the P [Prince MARTIN MURFF].”

58. On or about May 15, 2018, during a recorded call, EDDIE REID informed an AVLN member and associate that REID was “trying to maintain our demonstration...the last person who had it got headquartered to a death sentence.” REID further stated that he needed to “bump life into this mother fucker and ya know what I'm saying, rebuild and regroup...I just want them bros to be on one accord...and we demonstrating from the Chicago Act.”

59. On or about August 14, 2018, during a recorded call, SPOONIE JOHNSON discussed obtaining controlled substances to sell them.

60. On or about August 15, 2018, EDDIE REID texted another AVLN member and associate about drug trafficking. REID asked the AVLN member if he had drugs for sale. During the conversation, the AVLN member stated, "Ok tryin to bring some money to the to the (sic) ^\." REID responded, "Indeed because we might need like to take a trip to the chi [Chicago] and pick up these few pounds." REID later stated, "Cool cause we definitely needs (sic) to be down there and I'll call and let the P [MARTIN MURFF] know we coming on a Finance trip."

61. On or about August 16, 2018, DELAINO EPPENGER posted on Facebook, "I kall it for da Mob inna city im frm da west and Lords heavy everywhere inna city now east & west." EPPENGER stated that his name was "Lord Ace[,] and that he was a "5 Star BE."

62. On or about August 26, 2018, during a recorded call, SPOONIE JOHNSON discussed raiding a stash house. During

the discussion, SPOONIE JOHNSON requested multiple DEA [Drug Enforcement Administration] shirts as part of the planned raid.

63. On or about September 15, 2018, during a recorded call, KENNETH JOHNSON explained that he was going to give an IVL member five-star branch elite status.

64. On or about September 17, 2018, during a recorded call, an AVLN member and associate explained that GREGORY JOHNSON just received the “seat” [top rank] for the CIVLs. He explained that GREGORY JOHNSON is the “Glove” [five-star U.E.] in the “Mit” [Michigan].

65. On or about October 14 and 15, 2018, during recorded calls, SCHUYLER BELEW JR. attempted to arrange to steal a truck for the AVLN.

66. On or about October 25, 2018, an AVLN member and associate sent KEVIN FORDHAM a Facebook message, stating

“Mighty mighty big bruh I didn’t know you was the P [Prince]
over the state...”

67. On or about December 11, 2018, during a recorded call,

JAVON WILHITE indicated that he had been a Vice Lord for
four years.

68. On or about December 14, 2018, during a recorded call,

SPOONIE JOHNSON stated that he was one of the individuals
that started the TVLs in Michigan.

69. On or about January 4, 2019, EDDIE REID sent a

Facebook message in a MIVL group chat. REID stated, “Al
Shabazz...HHDD...to whom this may concerns but y'all need to
stop stalling with your dues if they not in by 6pm tonight we're
coming no excuses we ain't gon be playing these games
especially when ones know...the ones that did pay have no
worries but the ones that didn't needs to tighten up and tune
in...i leave as I came 6 4.”

70. On or about January 6, 2019, EDDIE REID posted a photograph of a suspected firearm to Facebook.

71. On or about January 7, 2019, EDDIE REID sent a photograph depicting suspected firearms to an AVLN member and associate, stating, "And i just copped an FN...Telling you Sane I'm using this bitch on Murda [another AVLN member and associate] ass." The AVLN member asked, "Wtf can you get another one?" REID replied, "You need one I can get you one." The AVLN member replied, "Hell yea I most definitely can take one of those." REID stated, "And I'm bout to get this modified G22 where the shells don't spit out for 250...Hell yeah we all getting tooled up out here i swear I'm knocking shit loose especially if they call me up there." The AVLN member responded, "I don't think they will cause they in wrong fuck this bs ain't no telling what they on letting dude back in it I don't trust shit." REID replied, "Me neither Sane that's why I'm not

taking no L wit they ass I'm blowing these n-----  the Fuck off."

72. On or about January 25, 2019, SCHUYLER BELEW JR., SPOONIE JOHNSON, and other AVLN members and associates, attended a goal at SCHUYLER BELEW JR.'s residence. During the meeting, AVLN members and associates discussed TVL and AVLN business, including violations of members who violated AVLN rules, and stealing cars.

73. On or about February 3, 2019, DEVAN TURNER-BANKHEAD sent a message to EDDIE REID about the recruitment of potential MIVL members. TURNER-BANKHEAD wrote, "I gotta Goon that I can make Enforcer out there that can handle shit...N---- names Texas...He used to be one of O seeds too...Back when he had the Glove for Damn."

74. On or about February 7, 2019, SPOONIE JOHNSON discussed various matters relating to the TVLs, the AVLN, and

its members, including the ranks and histories of AVLN members like TERRY DOUGLAS and SCHUYLER BELEW JR.

75. On or about February 8, 2019, SCHUYLER BELEW JR. hosted AVLN members and associates at his residence for a goal. At this meeting, AVLN members discussed TVL and AVLN business.

76. On or about February 9, 2019, EDDIE REID sent a Facebook message discussing an upcoming MIVL meeting, demanding that someone from Inkster attend, and wanted to know if any gang prospects would be coming as well. DEVAN TURNER-BANKHEAD responded that he needed a ride.

77. On or about February 10, 2019, EDDIE REID sent a message in a MIVL group chat. REID stated, "P.S.A. Starting tomorrow Mandatory roll call needs to be in by 5pm miss one it'll be a Fine And whenever there's a Mandatory ones better tune in don't have us waiting all day because I'm not playing

tune in or get tuned out miss 3 mandatory will result in physical V point blank period.”

78. On or about February 10, 2019, during a recorded call, SCHUYLER BELEW JR. stated that LAWON CARTER had an “opportunity for the whole body to eat... he's trying to help all of us as a whole,” and that the rest of the TVLs needed to meet with LAWON CARTER.

79. On or about February 13, 2019, during a recorded call, SCHUYLER BELEW JR. stated that yesterday, LAWON CARTER supplied BELEW JR. with controlled substances to sell.

80. On or about February 15, 2019, EDDIE REID sent DEVAN TURNER-BANKHEAD a video and stated that he had just assaulted a former AVLN member. TURNER-BANKHEAD responded, “U Whooped Him Big Bro.” REID replied, “And that’s Mafia to these STUPID MUTHA FUCKAS.”

81. On or about February 23, 2019, EDDIE REID informed MIVL members in a Facebook group chat, "Oh Yeah by the way [former AVLN member] is no longer 64 if i catch demoing wit him I'm fucking y'all up and if Y'all catch him speaking MAFIA or 64 anything mash on sight."

82. On or about March 2, 2019, during a recorded call, TERRY DOUGLAS discussed obtaining various controlled substances from LAWON CARTER.

83. On or about March 8, 2019, during a recorded call, DAVUN BASKERVILLE discussed the May 7, 2015, TVL shooting of T.T., S.T, V.T., and T.T. Upon learning that an individual suspected of cooperating with law enforcement has been located BASKERVILLE stated, "Man, that the n---- that told on n---- he the reason why the feds came when all this shit happened." BASKERVILLE further stated, "I know exactly who he is...trust me...and I'm on his ass too, cause then n----told and got my bros in that bitch." BASKERVILLE then stated, "that

bitch is ATF number 2, his brother is ATF-1, cause his mama and his brother and sister got shot...we shot they bitch asses...this shit ain't over with...I can't wait."

84. On or about March 9, 2019, during a recorded call, DAVUN BASKERVILLE, SCHUYLER BELEW JR., and an AVLN member and associate discussed assaulting V.T. and S.T., whom they believed to have cooperated with law enforcement leading to the arrest of AVLN members.

85. On or about March 16, 2019, DEVAN TURNER-BANKHEAD sent a Facebook message to EDDIE REID stating, "I'm in line at western union...Who I send these dues to?" REID replied, "Eddie reid...Make sure you have the Mcn # on the receipt (sic)."

86. On or about March 22, 2019, during a recorded call, DAVUN BASKERVILLE explained that there are three outcomes that come with being a Vice Lord. BASKERVILLE explained, "[W]e can advance, they can lock us up, or we can

end up dead. . . we know them three can come with it. . . so why turn yo back when you see things hit the fan."

87. On or about March 24, 2019, on a recorded call, SPOONIE JOHNSON stated that FABIAN TOODLE is a "Branch Elite," and received his status from the Universal Board.

88. On or about April 6, 2019, during a recorded call, TERRY DOUGLAS described his status as a leader within the TVLs, and discussed the "team" of leaders within that branch of the AVLN.

89. On or about April 18, 2019, SPOONIE JOHNSON possessed cocaine.

90. On or about April 19, 2019, during a recorded call, TERRY DOUGLAS stated that he holds the rank of Five-Star Universal Elite.

91. On or about May 3, 2019, DEVAN TURNER-BANKHEAD sent a Facebook message to an AVLN member and associate, explaining that he was selling "molly" [ecstasy].

92. On or about May 24, 2019, JAYLIN MCNEAL sent a Facebook message, stating “Getting these perks” [Percocet pills].

93. On or about June 23, 2019, GREGORY JOHNSON sent KURTEIZ THOMPSON a text message stating, “Bro my bag tomorrow it’s a must[.]”

94. On or about July 26, 2019, EDDIE REID contacted DEVAN TURNER-BANKHEAD, stating, “64 bino whatever you made off that bring it tonight and give to [an unindicted AVLN member and associate]....64.” TURNER-BANKHEAD explained that he had a stomach virus, but the money would be there. REID stated, “Look here it’s Holy day and I’m being lil humble but it’s mandatory today and tomorrow.”

95. On or about August 2, 2019, DEVAN TURNER-BANKHEAD sent EDDIE REID several photographs of females, asking “U know who wanna buy dat?” REID asked,

“Who dis?” TURNER-BANKHEAD stated, “A hoe I’m finna have for rent.” REID stated, “Oh okay.”

96. On or about August 2, 2019, DEVAN TURNER-BANKHEAD sent a Facebook message to an AVLN member and associate, describing how he was prostituting a female and selling drugs. “Bro I gotta bag...I gotta girl Makin \$ for me...U know and tricks.” The AVLN member stated, “Gotcha Gotcha.” TURNER-BANKHEAD responded, “Lemme know...Tell em \$100 get you whatever u want.” The AVLN member responded, “Fasho...What she looking like?” TURNER-BANKHEAD sent the AVLN member eleven photographs depicting female body parts.

97. On or about August 5, 2019, an AVLN member and associate sent a Facebook message to EDDIE REID, stating, “What’s the demo?” REID responded, “Not shit bout to get some more  i just ran out...They started coming for them around 2

this morning." The AVLN member responded, "Most Def need to come and get some of those today."

98. On or about August 7, 2019, LAWON CARTER sold approximately 2.32 grams of a mixture and substance containing heroin, fentanyl, cocaine, and tramadol.

99. From April 2019 through August 11, 2019, TERRY DOUGLAS and LAWON CARTER exchanged several messages about selling controlled substances.

100. On or about August 11, 2019, during a recorded call, ARTISE JOHNSON stated that he was the "M.O.C." over the "Squad" [9 Squad], and that he oversaw the "Squad" in prison.

101. On or about August 27, 2019, an AVLN member and associate requested permission from EDDIE REID to extort an individual. REID gave permission, stating, "Well you know she can't be Mafia but you can extort her."

102. On or about August 27, 2019, LAWON CARTER sold approximately 2.77 grams of a mixture and substance containing heroin, fentanyl, and tramadol.

103. On or about August 29, 2019, EDDIE REID sent a Facebook message to an AVLN member and associate, stating, "Is it anything else i need to know before tomorrow because this bullshit can't get any bigger." The member responded, "Lmmfao as of right now no. But i did tell Taila to let the other 2 Bella's kno that they presence is needed after the ace shit was brought to ur attention. Because hearsay dont work need to hear it from the source (red n lexi) plus ace." REID stated, "I mean since an female enforcer had brought to my attention...Seems like Friday is going to be full of beatings."

104. On or about August 31, 2019, during a recorded call, TERRY DOUGLAS explained that he was the "Chief" for the TVLs in Michigan, and was on the AVLN Board of Michigan.

105. On or about September 5, 2019, DELAINO EPPENGER sent a Facebook message to several MIVL members, informing them that there was a mandatory meeting the following day. EDDIE REID responded to the message, "Everytime before meeting it's always bullshit so this bullshit ends tonight. IDGAF WHO YOU ARE I'LL PUNCH YO FUCKIN EYE...Tonight meeting is on Dacosta no excuse."

106. On or about September 5, 2019, at 17247 Goddard Street, Detroit, Michigan, LAWON CARTER possessed a 7.62 x 39 caliber rifle with an extended-capacity magazine, assorted ammunition, approximately 94 grams of cocaine base, approximately 28.42 grams of cocaine hydrochloride, and approximately 3 grams of fentanyl.

107. On or about September 5, 2019, at 19654 Algonac, Detroit, Michigan, LAWON CARTER possessed an AR-style pistol, a 7.62 caliber rifle, assorted extended-capacity magazines and

ammunition, and approximately 43.44 grams of cocaine hydrochloride and 18.9 grams of cocaine base.

108. On or about September 9, 2019, DEVAN TURNER-BANKHEAD discussed with an AVLN member and associate that TURNER-BANKHEAD was selling cocaine base.

109. On or about September 10, 2019, ANTHONY REYNOLDS discussed selling controlled substances and AVLN business with an AVLN member and associate on Facebook.

110. On or about September 20, 2019, in a series of Facebook messages following a shooting of an AVLN member and associate, MIVL members, including DEVAN TURNER-BANKHEAD, DELAINO EPPENGER, and other AVLN members and associates, discussed the shooting and possible retaliation. TURNER-BANKHEAD offered aid and assistance, including providing a firearm for MIVL members in Inkster to use to retaliate. TURNER-BANKHEAD later responded, "Y'all can't worry bout what they got u gotta worry bout getting them

b4 they get yall...U gotta be willing to strike when they wont."

TURNER-BANKHEAD also stated, "All of them ain't gone shoot bro...Hit the head the body fall...Anyways it's tooo much being said as usual...All I said was leave the hood lil vro (sic)."

111. On or about September 20, 2019, SPOONIE JOHNSON and another individual exchanged Facebook messages about the quality of controlled substances that SPOONIE JOHNSON had sold the individual.

112. On or about September 27, 2019, during a recorded call, TERRY DOUGLAS explained he was a member of the AVLN Board of Michigan, stating "I got the line to everybody. . . everybody fucking with me . . . every household, every fucking club, everybody. . . I am a board member now."

113. On or about October 9, 2019, during a recorded call, TERRY DOUGLAS discussed his authority to appoint TVL members into leadership positions, and that leaders within the TVL are to ensure that "the fucking enforcers is doing what the

fuck they supposed to do when its handed down through the chain...It just simple shit."

114. On or about October 18, 2019, during a recorded call, KURTEIZ THOMPSON explained that he sits on the "Board," and the IVL ranking order was "Ghetti" [KEVIN FORDHAM], "P" [an unindicted AVLN member and associate], [unintelligible third name], and then THOMPSON.

115. On or about October 24, 2019, during a recorded call, ARTISE JOHNSON and an AVLN member and associate discussed how a co-defendant made a statement against the AVLN member. ARTISE JOHNSON asked if the AVLN member was going to get an affidavit recanting the statement from his co-defendant, and the AVLN member confirmed.

116. On or about October 25, 2019, DEVAN TURNER-BANKHEAD discussed that he owed money to EDDIE REID

who provided TURNER-BANKHEAD with heroin on consignment.

117. On or about October 27, 2019, an AVLN member and associate sent a Facebook message to EDDIE REID stating, “Tomorrow conference call with P [Prince MARTIN MURFF] sane.”

118. On or about November 23, 2019, an AVLN member and associate sent a video to EDDIE REID of a violation that REID ordered on another AVLN member and associate. “This was your idea   

119. Starting on or about November 24, 2019 and continuing until at least January 29, 2020, EDDIE REID exchanged a

series of messages with an AVLN member and associate, during which they discussed purchasing a building for the MIVLs to sell illegal drugs and store firearms.

120. On or about December 3, 2019, DELAINO EPPENGER sent a Facebook message in a MIVL group chat stating, “MANDATORY MEETING FRIDAY CAPO HOUSE 7:00 o'clock Dues are to be in.”

121. On or about December 3, 2019, during a recorded call, ARTISE JOHNSON told KURTEIZ THOMPSON that an AVLN member is not supposed to be a “bro” [AVLN member] anymore and there is a “21” [kill order] on him.

122. On or about December 8, 2019, EDDIE REID stated on Facebook, “Not only that I'm mafia but I'm the one who governs the whole state of Michigan.”

123. On or about December 20, 2019, during a recorded call, KENNETH JOHNSON explained, “I'm about to tell you the shit from the bottom up.” JOHNSON stated, “Out Kold” [ARTISE

JOHNSON] is the “M.O.C.” [Minister of Command], “Law” [an unindicted AVLN member and associate] is the “M.O.J.” [Minister of Justice], “Teiz” [KURTEIZ THOMPSON] is “C [Chief],” and then there is “P” [an unindicted AVLN member and associate] and the person whose name is “food” [KEVIN FORDHAM] at the top.

124. On or about December 21, 2019, during a recorded call, ARTISE JOHNSON told an IVL inmate that a “Key 21” [kill order] was still in effect against the 4 Corner Hustlers branch.

125. On or about December 24, 2019, during a recorded call,

MARTIN MURFF spoke with an unindicted MIVL leader. During the conversation, the unindicted MIVL leader, who is currently incarcerated, asked for updates from MARTIN MURFF about MIVL activities on the outside. The unindicted MIVL leader asked who was “speaking for us” on the “Avenue up there.” MURFF responded, “E Lee [EARNEST LEE] up there” and that he was “rotating hard.” The unindicted MIVL

leader then directed MURFF, “E Lee [EARNEST LEE] he need to know next time, Buddy try and have a goal up there, they need to go through and shut that down.” MURFF stated, “I got you...period.”

126. On or about January 14, 2020, during a recorded call, ARTISE JOHNSON told SHELTON CARTER that they have a goal on Saturday at 5 p.m., and CARTER said that he would call before it starts. ARTISE JOHNSON told CARTER that he has a 15-minute grace period before it starts.

127. On or about January 15, 2020, MARTIN MURFF conducted a telephone conversation with an unindicted MIVL leader regarding AVLN business.

128. On or about January 24, 2020, during a recorded call, ARTISE JOHNSON explained that the IVLs came into existence as the “law keepers[,]” the CVLs were supposed to “spread the knowledge,” the TVLs were supposed to “travel and get the group big,” the Unknowns were supposed to “be in the

shadows and put in work[.]” The 4 Corner Hustlers were the “hustling n-----” and were supposed to “add to the finances.” ARTISE JOHNSON explained, “this is what we do to maintain order.”

129. On or about January 24, 2020, during a recorded call, an IVL inmate told ARTISE JOHNSON that he and another IVL inmate were still in the “hole” and they were trying to get out of solitary confinement but at the same time, they have to “uphold this banner” and deal with anything that comes their way. ARTISE JOHNSON responded that is what they signed up for, and you have to “honor your elites[.]” because the elites “proved themselves to get to that point.” The IVL inmate responded, “I love this shit” and explained, “ten thousand n----- can’t stand next to no Vice Lord.”

130. On or about January 27, 2020, Prince MARTIN MURFF sent an unindicted AVLN leader \$80.00 via Western Union.

131. On or about February 3, 2020, during a recorded call, KURTEIZ THOMPSON informed an AVLN member and associate that they had a “Universal Goal” with all the “tribes” yesterday.

132. On or about February 4, 2020, during a recorded call, ARTISE JOHNSON stated that there was still a “Key 21” [kill order] on the Bloods and called for “25” [violations] for anyone who did not provide an aid and assist. On or about February 13, 2020, SHELTON CARTER struck M.W. with closed-fist punches and ANTHONY SIMMONS stabbed O.J.

133. On or about February 6, 2020, ANTHONY REYNOLDS sent multiple messages, announcing, “We back on,” and offering to sell heroin, cocaine, and methamphetamine.

134. On or about February 9, 2020, JAVON WILHITE and another individual sold an AM-15 rifle.

135. On or about February 14, 2020, ANTHONY REYNOLDS exchanged a series of messages with an individual about

ANTHONY REYNOLDS's sale of cocaine to that person that day.

136. On or about February 23, 2020, during a recorded call, KENNETH JOHNSON explained that he received his "5[star] B.E." and was on "hold for my U[niversal]."

137. On or about February 28, 2020, during a recorded call, ARTISE JOHNSON told an AVLN member and associate that everything was wonderful, and the "Board" was put back together. ARTISE JOHNSON explained that a lot of "houses" were on the Board, except the "4s" [4CH], "Us" [UVLs], and possibly the "Renegades" [RVLs]. ARTISE JOHNSON explained that the Board was trying to plan a bunch of events together.

138. On or about March 4, 2020, KURTEIZ THOMPSON texted GREGORY JOHNSON, "So hmu on any money play I'm broke and tell face to get with me." JOHNSON replied, "We

gotta get to it now.” THOMPSON liked JOHNSON’s statement.

JOHNSON stated, “Bro anything I got going u on it with me[.]”

139. On or about March 9, 2020, during a recorded call, ARTISE JOHNSON told an AVLN member and associate that an IVL member just had a “situation out here[.]” and “we on the 21 [kill order] tip.” ARTISE JOHNSON later said that the IVL member was trying to get his people “OT” [out of town] because “we about to move on the 21 [kill order] tip right now[.]” and that people got “down on him . . . and his mans . . . and we got to bounce back [retaliate].”

140. On or about March 18, 2020, GREGORY JOHNSON received a group chat message with two photographs depicting suspected dues payments, and a message stating, “This was the last time our deck paid dues.”

141. On or about March 30, 2020, DELAINO EPPENGER sent a Facebook message about selling marijuana. Eppenger posted,

“Crud [marijuana] on deck tap in doing deliveries...\$10 g \$10
1.7s \$15 1.7s (drop off) \$25 3.5s \$50 7g.”

142. On or about April 5, 2020, DAVUN BASKERVILLE shot and killed J.G., and non-fatally shot K.C., in Detroit, Michigan. On or about September 12, 2020, during a recorded meeting, TERRY DOUGLAS stated his belief that J.G. had been working with federal law enforcement. On or about September 25, 2020, TERRY DOUGLAS discussed the April 5, 2020 shooting of J.G. by DAVUN BASKERVILLE. During the conversation, TERRY DOUGLAS explained that SCHUYLER BELEW JR. ordered DAVUN BASKERVILLE to do the shooting to avoid TERRY DOUGLAS ordering him to do it. On or about October 14, 2020, during two recorded calls, JOVAN WILHITE discussed how DAVUN BASKERVILLE killed J.G. at TERRY DOUGLAS's direction.

143. On or about April 9, 2020, DEVAN TURNER-BANKHEAD acknowledged his MIVL membership during a conversation with an MIVL leader. The MIVL stated, “64 binos and bellas dont forget too make roll call before 4:55 or v,s and fines will be handed out 64.” DEVAN TURNER-BANKHEAD responded, “64.”

144. On or about April 11, 2020, during a recorded call, KURTEIZ THOMPSON informed an AVLN member and associate, “Your top [CIVL GREGORY JOHNSON] he just called me, and you know we . . . This my baby . . . Brothers need to understand that we all nine . . . And we need to move as such . . . the ultimate goal is that we need to move as one whole nation.”

145. On or about April 16, 2020, during a recorded call, KURTEIZ THOMPSON and an AVLN member and associate discussed THOMPSON’s sister’s murder. The two discussed the Blood members that killed THOMPSON’s sister, and

THOMPSON explained that the planned retaliation was still “on the floor.” THOMPSON told the inmate that he would send the news article with the murderers’ names.

146. On or about May 6, 2020, during a recorded call, ANTHONY REYNOLDS discussed that he was selling cocaine and heroin.

147. On or about June 3, 2020, GREGORY JOHNSON sent three photographs of a court case with a handwritten note discussing why someone is in the “hole,” “three stars,” and “20 years for loyalty[.]”

148. On or about June 4, 2020, GREGORY JOHNSON possessed one Kahr Arms, model CW 45, .45 caliber pistol, and .45 caliber ammunition.

149. On or about June 18, 2020, during a recorded call, while in custody, GREGORY JOHNSON directed and organized CIVL members on the street.

150. On or about July 3, 2020, during a recorded call, KENNETH JOHNSON explained that the 9 Squad pays dues, and JOHNSON makes the members “hit their pockets” and will tell people he wants \$100 a month.

151. On or about July 18, 2020, on Facebook, DELAINO EPPENGER discussed drug trafficking with an out-of-state AVLN member and associate.

152. On or about July 25, 2020, KEVIN FORDHAM, KURTEIZ THOMPSON, EDDIE REID, DELAINO EPPENGER, SPOONIE JOHNSON, TERRY DOUGLAS, JAYLIN MCNEAL, KENNETH JOHNSON, and other AVLN members and associates, attended the AVLN Annual Picnic at Field’s Playground, in Detroit, Michigan.

153. On or about August 8, 2020, during a recorded call, KURTEIZ THOMPSON discussed providing marijuana to an incarcerated AVLN member and associate.

154. On or about August 28, 2020, DELAINO EPPENGER sent a Facebook message, stating, "I'm Lord Ace 3ue for Mafia Insane." A Facebook user responded, "I'm lord dub 3ue moj of the state and mol of the city for double II's."

155. On or about September 15, 2020, TERRY DOUGLAS sold approximately one gram of heroin and suspected "ecstasy"/MDMA pills, which later tested positive for methamphetamine.

156. On or about September 16, 2020, TERRY DOUGLAS sold approximately one gram of crack cocaine and suspected "ecstasy"/MDMA pills, which later tested positive for methamphetamine. During the transaction, TERRY DOUGLAS discussed the sale of heroin, and described that he "cut" his heroin with fentanyl to get his customers addicted. TERRY DOUGLAS also discussed AVLN business, stating, "by law, if your chief tell you to do something, you got to follow the

order . . . As long as I give the instruction for these hustlers to violate you, that's what's gonna happen."

157. On or about September 22, 2020, TERRY DOUGLAS sold approximately 2.5 grams of heroin.

158. On or about September 24, 2020, TERRY DOUGLAS explained that KEVIN FORDHAM is "the Head Seat for the Board" and "he the Supreme Chief for the Board." DOUGLAS also explained that FORDHAM was the highest-ranking Vice Lord member "[s]ince they give him that Prince spot..."

159. On or about September 25, 2020, TERRY DOUGLAS, JAYLIN MCNEAL, ANTHONY REYNOLDS, GARY PORTER, NAUJEH CARTER, and other AVLN members and associates, attended a goal. During the meeting, AVLN members discussed TVL and AVLN business, including controlled substances and a new member joining the branch. JAYLIN MCNEAL discussed growing and selling marijuana. ANTHONY REYNOLDS

discussed retaliating against an individual who had assaulted a TVL member.

160. On or about October 1, 2020, during a recorded call, an AVLN member and associate explained that KURTEIZ THOMPSON and an unindicted AVLN member and associate gave KENNETH JOHNSON “3 universal degrees [three-star U.E. rank]” now that KENNETH JOHNSON was back in prison.

161. On or about October 2, 2020, DELAINO EPPENGER posted a Facebook Live video depicting his possession of a Kel-Tec RFB rifle.

162. On or about October 2, 2020, TERRY DOUGLAS, JAYLIN MCNEAL, GARY PORTER, and other AVLN members and associates attended a goal. During the meeting, GARY PORTER was “blessed in” to membership of the TVLs and AVLN.

163. On or about October 6, 2020, TERRY DOUGLAS sold approximately 4 grams of cocaine base. TERRY DOUGLAS also discussed his role in managing drug trafficking in the area immediately surrounding the sale.

164. On or about October 22, 2020, SPOONIE JOHNSON discussed various matters regarding the TVLs and AVLN and its members, including that he was a member of the Michigan Board.

165. On or about October 23, 2020, TERRY DOUGLAS, JAYLIN MCNEAL, NAUJEH CARTER, and other AVLN members and associates attended a goal. During the meeting, NAUJEH CARTER was “blessed in” to membership of the TVLs and AVLN.

166. On or about October 30, 2020, TERRY DOUGLAS discussed killing FABIAN TOODLE.

167. On or about October 30, 2020, TERRY DOUGLAS, NAUJEH CARTER, ANTHONY NAJERA, GARY PORTER,

and other AVLN members and associates, attended a goal. During the meeting, members discussed TVL and AVLN matters, including a physical violation for JAYLIN MCNEAL failing to come to the meeting, and the incarceration status of other absent members. During the meeting, TERRY DOUGLAS discussed his “hit squad,” and that GARY PORTER was part of it. GARY PORTER displayed a handgun.

168. On or about November 4, 2020, DELAINO EPPENGER possessed a Kel-Tec RFB rifle, ammunition, marijuana, and MIVL documents.

169. On or about November 4, 2020, TERRY DOUGLAS, GARY PORTER, and another individual met and discussed TVL and AVLN business. TERRY DOUGLAS described his desire that members of the AVLN Board of Michigan be killed “ASAP,” and that he would be acquiring firearms that night.

170. On or about November 6, 2020, JAVON WILHITE sold two AM-15 rifles.

171. On or about November 9, 2020, JAVON WILHITE, while accompanied by FABIAN TOODLE, sold an AK-style rifle and an extended magazine containing 26 rounds of 7.62mm ammunition.

172. On or about November 13, 2020, TERRY DOUGLAS possessed a loaded 9mm pistol, ammunition, and a plastic bag containing approximately 20 smaller bags of cocaine base intended for distribution.

173. On or about November 21, 2020, JAYLIN MCNEAL, ANTHONY NAJERA, NAUJEH CARTER, and another AVLN member and associate, attended a goal. During the meeting, AVLN members discussed TVL and AVLN business, including whether to join JOVAN WILHITE's "deck," or to wait for TERRY DOUGLAS to be released following his November 13, 2020 arrest.

174. On or about November 24, 2020, JAVON WILHITE sold approximately 25 gross grams of cocaine base and 2.95 gross

grams of fentanyl. TYRONE FISHER drove WILHITE to the drug sale and acted as WILHITE's security.

175. On or about November 24, 2020, GARY PORTER sold approximately 4 gross grams of heroin and cocaine base.

176. On or about November 27, 2020, JAVON WILHITE, FABIAN TOODLE, and other AVLN members and associates attended a goal. During the meeting, AVLN members discussed TVL and AVLN business, including firearms, their ranking structure, and paying dues. JOVAN WILHITE stated that dues would be set aside to assist AVLN members with bills and legal trouble.

177. On or about November 28, 2020, during a recorded call, EDDIE REID discussed receiving an order from the MIVL leadership in Chicago to kill an AVLN member and associate who they believed was cooperating with law enforcement. On or about November 29, 2020, EDDIE REID met with DELAINO

EPPENGER and other AVLN members and associates to discuss the kill order and logistics to carry out the order.

178. On or about November 30, 2020, WINISFORD WATKINS

sold approximately 28 grams of cocaine.

179. On or about November 30, 2020, during a recorded

conversation, WINISFORD WATKINS stated, "you know I got the rank, n---- . . . I'm under Hog [BRANDON THOMAS] . . .

[I'm] Chief Enforcer up in [indistinguishable]."

180. On or about December 1, 2020, during a recorded call,

EDDIE REID discussed murdering IVL Prince KEVIN

FORDHAM and taking his position. REID stated, "We got to go hard or don't go hard at all." REID explained that he was not worried about FORDHAM. REID stated, "My goal for 2021 is to overthrow this motherfucker [FORDHAM] out that seat."

181. On or about December 3, 2020, during a recorded meeting,

EDDIE REID and DELAINO EPPENGER discussed a plan to overthrow KEVIN FORDHAM's position as leader. EPPENGER

stated, "It's going to be us versus them, and you other there with them mother fuckers." REID stated, "With how the way it's going to be looking, if we do it right, nobody gonna have to spend their lives in prison."

182. On or about December 3, 2020, SPOONIE JOHNSON sold approximately 7 grams of cocaine.

183. On or about December 9, 2020, WINISFORD WATKINS sold approximately 27.95 grams of cocaine.

184. On or about December 10, 2020, TAMAR WATKINS sold approximately 27 grams of cocaine.

185. On or about December 10, 2020, during a recorded call, an AVLN member and associate stated that TAMAR WATKINS was a Five-Star Universal Elite.

186. On or about December 11, 2020, on Facebook, EDDIE REID discussed his belief that DEVAN TURNER-BANKHEAD informed an AVLN member about the plot to kill him.

187. On or about December 11, 2020, during a recorded call, DELAINO EPPENGER discussed drug trafficking with EDDIE REID.

188. On or about December 15, 2020, WINISFORD WATKINS sold approximately 48.15 grams of cocaine base.

189. On or about December 21, 2020, during a recorded call, ANTHONY NAJERA confirmed that today he purchased an ounce of powder cocaine from "Spoonie" [TAMAR WATKINS] for \$1,500 with the intent to sell the drugs with NAUJEH CARTER outside of Michigan.

190. On or about December 22, 2020, during a recorded MIVL meeting, DELAINO EPPENGER stated that he knew a Bounty Hunter Blood gang member who wanted to join forces with the MIVL.

191. On or about December 22, 2020, during a recorded call, TYRONE FISHER discussed owing JAVON WILHITE money, and WILHITE's threats to harm FISHER if FISHER did not pay WILHITE back. FISHER stated, "As much work as a n---- put in for you bro', I'm like your personal security n----, every time I'm wit you ain't nobody fuckin' wit you or nothin'..." FISHER further explained, "I'm the most loyalist n---- that we got bro', on my crown bro' that's how I do! And you threatenin' me though? You serious? With guns n----? Like?"

192. On or about December 23, 2020, NAUJEH CARTER possessed cocaine base and prescription pills.

193. On or about December 23, 2020, during a recorded call, ANTHONY NAJERA, stated that TAMAR WATKINS supplied the drugs with which NAUJEH CARTER was arrested.

194. On or about December 26, 2020, during a recorded call, ANTHONY NAJERA explained that he had 15 ounces of methamphetamine from Arizona. NAJERA stated that he lost

\$550 in Monroe after his girl was robbed. NAJERA explained he was supposed to go to Monroe and beat up the girl. NAJERA mentioned making \$700-\$800 a night.

195. On or about December 27, 2020, during a recorded call, KENNETH JOHNSON told an AVLN member that he paid "Chuckles" [CHARLES DOUGLAS] money to get a witness against JOHNSON to change her statement. JOHNSON complained that CHARLES DOUGLAS took the money but did not do anything.

196. On or about December 28, 2020, and continuing to December 29, 2020, TAMAR WATKINS arranged to sell heroin.

197. On or about December 29, 2020 DELAINO EPPENGER sold Percocet pills, and stated that he had an additional 50 pills for sale.

198. On or about December 29, 2020, LATEEF MOORE sold approximately 20 grams of heroin, as arranged by TAMAR WATKINS.

199. On or about January 7, 2021, EDDIE REID stated that he sold some of the Chicago-supplied controlled substances to DARRYL TAYLOR.

200. On or about January 9, 2021, during a recorded meeting, TAMAR WATKINS explained that he worked with other TVLs to sell drugs, the benefits of being a TVL, and other topics relating to the Vice Lords.

201. On or about January 14, 2021, DELAINO EPPENGER sold approximately three grams of heroin. EDDIE REID arranged the drug sale.

202. On or about January 22, 2021, DARRYL TAYLOR sold approximately 7.15 gross grams of heroin and tramadol.

203. On or about January 22, 2021, during a recorded call, MARTIN MURFF discussed the sale of drugs with a phone number ending in 7974. The caller stated that everyone wanted the “new” [fentanyl]. MARTIN MURFF explained that he had both the “new” [fentanyl] and “old” [heroin].

204. On or about January 25 through January 26, 2021, during recorded calls, MARTIN MURFF arranged for the sale of fentanyl.

205. On or about January 26, 2021, EDDIE REID and DELAINO EPPENGER sold approximately 14.05 grams of heroin.

206. On or about January 26, 2021, during a recorded call, MARTIN MURFF told EARNEST LEE that he arranged for the sale of 25 grams of the “new,” [fentanyl] which was grayish purple.

207. On or about January 27, 2021, during recorded calls, MARTIN MURFF discussed with a telephone number ending in 7974, how an AVLN member and associate from Memphis, Tennessee, was traveling on a Greyhound bus and would be arriving at 5:10 p.m. in Chicago to purchase heroin from MARTIN MURFF. As payment for the drugs, MARTIN MURFF received a wire transfer of \$2,125.00.

208. On or about January 27, 2021, MARTIN MURFF delivered approximately 25.8 grams of fentanyl to an out-of-state AVLN member and associate acting as a courier at the Greyhound bus terminal in Chicago, Illinois.

209. On or about January 28, 2021, JAYLIN MCNEAL sold approximately a pound of marijuana.

210. On or about January 28, 2021, during a recorded call, MARTIN MURFF informed a female AVLN member and associate that another AVLN member was not going to be killed because the AVLN members in that state did not have the authority to issue the kill order.

211. On or about February 4, 2021, during a recorded call, EDDIE REID told MARTIN MURFF that he had sold the last of the drugs from MURFF and EARNEST LEE for \$1,900. EDDIE REID ordered two ounces of drugs and asked that MURFF arrange the deal. MURFF agreed to text REID with LEE's, the supplier, contact information.

212. On or about February 4, 2021, during a recorded call, MARTIN MURFF told EARNEST LEE that "Twelvve" [Eddie REID] asked for LEE's number. MURFF explained that he wanted to ask LEE if that was okay first. LEE stated that he figured REID had changed numbers because LEE tried to call REID, but the phone was off. MURFF stated that REID always does that. MURFF said that he would send REID's new number. Approximately five minutes later, MURFF sent a text message to REID.

213. On or about February 5, 2021, during a recorded meeting, EDDIE REID discussed drug trafficking with MIVL members including DELAINO EPPENGER. EDDIE REID and DELAINO EPPENGER purchased approximately 39.6. grams of heroin and 8.2 grams of cocaine from ANGELO HOPSON. During the drug sale, HOPSON discussed how he asked EARNEST LEE to call MARTIN MURFF to make sure that EDDIE REID and DELAINO EPPENGER were cool.

214. On or about February 6, 2021, during a recorded call, SPOONIE JOHNSON discussed the seizure of guns by law enforcement from the home of JOHN JOHNSON. SPOONIE JOHNSON also stated that he had a new supplier for controlled substances.

215. On or about February 6, 2021, during a recorded call, KEVIN FORDHAM stated that he is the deciding vote for the Michigan Board.

216. On or about February 9, 2021, during a recorded call, MARTIN MURFF and EARNEST LEE discussed selling drugs.

217. On or about February 9, 2021, JOVAN WILHITE was involved in selling an AM-15 .223 rifle.

218. On or about February 9, 2021, JAYLIN MCNEAL sold approximately one pound of marijuana.

219. On or about February 10, 2021, during a recorded call, SPOONIE JOHNSON told KEVIN FORDHAM that he knew who TERRY DOUGLAS's drug supplier had been, and that he

would continue to work with that person. The two discussed other AVLN business including SCHULYER BELEW JR., TERRY DOUGLAS, DAVUN BASKERVILLE, DELAINO EPPENGER, and EDDIE REID, over the phone.

220. On or about February 12, 2021, during a recorded call, MARTIN MURFF discussed drug trafficking.

221. On or about February 12, 2021, JAVON WILHITE stated in a Facebook group chat with TVL members and associates, including FABIAN TOODLE and JAYLIN MCNEAL, that a goal was going to happen February 26, 2021, and that all needed to attend, and pay their \$25 dues.

222. On or about February 12, 2021, during a recorded call, MARTIN MURFF discussed that an individual owed him \$18,000 and that members were not paying their dues.

223. On or about February 12, 2021, during a recorded call, KEVIN FORDHAM discussed AVLN business with another AVLN member, including how they know that another AVLN member cooperated with law enforcement by reviewing the discovery paperwork. FORDHAM explained, "Hey bro, you know I. You know me, I'm a fair brother. You know I'll be on no fuck shit, bro, but I seen (sic) the paperwork too, and then you said you were not a part of us no more." The AVLN member later stated, "You can get get (sic) killed over Universal status man. [Unintelligible] talking about you got universal stars n---- and your shit can't be verified, them n---- gonna kill you." FORDHAM replied, "Right, exactly."

224. On or about February 13, 2021, KEVIN FORDHAM discussed an IVL member posing as a chief or three-star U.E. and possibly being a "snitch." FORDHAM stated that the IVL member's name would be in another IVL member's discovery paperwork.

225. On or about February 19, 2021, MARTIN MURFF and EARNEST LEE discussed selling a large quantity of fentanyl. LEE explained that he could provide the “crew” and “calvary” for the transaction.

226. On or about February 19, 2021, EDDIE REID sold approximately 15.3 grams of heroin.

227. On or about February 22, 2021, DELAINO EPPENGER and AVLN members and associates attempted to locate a former AVLN member for a physical assault because EDDIE REID stated that the member was “on bullshit.” EPPENGER also stated that if the AVLN member had a vehicle, “I would shoot that bitch up, too.”

228. On or about February 22, 2021, during a recorded call, KEVIN FORDHAM discussed AVLN unity and leadership with another AVLN member. FORDHAM stated, “I’m worldwide internationally known, I can go anywhere and get love, that same love n----, my stats stick, my status stick anywhere, n----

be oh that's big Chief or whatever. From all branches say that shit so n----- I'm not just Detroit bound, you know y'all get [unintelligible] if the n----- try to, try to fight over Detroit they can have that shit n-----, I just want unity[.]”

229. On or about February 23, 2021, JAVON WILHITE stated in a Facebook group chat with TVL members and associates, including FABIAN TOODLE and JAYLIN MCNEAL, that he was now the TVL Chief Elite for all of Michigan. He stated further that FABIAN TOODLE would be the TVL Chief for Detroit.

230. On or about February 23, 2021, during a recorded call, KEVIN FORDHAM and an AVLN member and associate discussed reviewing an AVLN member's discovery paperwork to see how many people made a statement against the AVLN member.

231. On or about March 11, 2021, WINISFORD WATKINS sold approximately 23.75 grams of cocaine base.

232. On or about March 12, 2021, during a recorded call, KEVIN FORDHAM and ANTIONE COLEMAN discussed selling marijuana.

233. On or about March 13, 2021, during a recorded call, KEVIN FORDHAM spoke with BRANDON THOMAS about a female IVL member's request to kill another Vice Lord member. During the conversation, THOMAS told FORDHAM that he would "ride" for FORDHAM and does not have a problem handling the situation.

234. On or about March 13, 2021, during a recorded call, KEVIN FORDHAM contacted an AVLN member and associate to discuss the female IVL member's request to kill another Vice Lord member. FORDHAM explained that he told Boss Hogg [BRANDON THOMAS] that he was not going to give him an order until there was a fair trial and FORDHAM must apply law. FORDHAM further explained that they can't put the Vice Lord member "in the dirt" without a fair trial.

235. On or about March 13, 2021, during a recorded call, KEVIN FORDHAM discussed with HARITH HUNTER how long he had been a member of the Vice Lords, and HUNTER said that he has been a member since the summer of 1994.

236. On or about March 15, 2021, DELAINO EPPENGER and AVLN members and associates attempted to locate AVLN member and associate, R.W., at the direction of EDDIE REID. EPPENGER stated that if R.W. has a car, "I would shoot that bitch up, too."

237. On or about March 16, 2021, during a recorded call, KEVIN FORDHAM and EDDIE REID discussed AVLN business. During the call, FORDHAM stated, "[A]ll the whole Board of Shabazz, everybody like n---- you [FORDHAM] really the king. I'm like, bro, I don't even use the title, the king, because n---- I was like shit, KT [an unindicted AVLN leader] still alive n----. I don't need to be a king. i was like n---- I know I'm a—I'm the head Chief of the, of the Single I[VL]'s.

That's all I need." REID responded, "Real shit. That's real. And like shit, like shit everybody know who the fuck you is[.]"

KEVIN FORDHAM and EDDIE REID also discussed drug trafficking, including how REID obtained drugs from Chicago.

238. On or about March 16, 2021, KEVIN FORDHAM sold approximately half a pound of marijuana and approximately 25.05 grams of cocaine base, which ZANIE TALIAFERRO supplied. Earlier that day, FORDHAM called TALIAFERRO asking for an ounce of crack, and TALIAFERRO agreed to supply it for \$1,600. FORDHAM told TALIAFERRO that the purchaser was a Vice Lord.

239. On or about March 22, 2021, SPOONIE JOHNSON possessed assorted ammunition, body armor, and AVLN documents.

240. On or about March 23, 2021, during a recorded call, BRANDON THOMAS discussed with KEVIN FORDHAM how he participated in a shooting the night before to assist an AVLN

member and associate. THOMAS said that he was going to “ride” for this AVLN member because he was a Vice Lord.

241. On or about March 23, 2021, during a recorded call, KEVIN FORDHAM and RASEAN WALKER discussed who would take over the IIVL leadership after the IIVL Chief’s death. FORDHAM explained that he would help restructure the IIVL branch.

242. On or about March 23, 2021, KEVIN FORDHAM instructed an AVLN member and associate to provide discovery paperwork to FORDHAM. Several minutes later, FORDHAM received a text message depicting the Wayne County Prosecutor’s Witness List for a homicide case. The witness list included the name of an IVL member.

243. On or about March 23, 2021, during a recorded call, KEVIN FORDHAM and HARITH HUNTER discussed how ATF executed a search warrant at Kaos’s [SPOONIE JOHNSON’s]

house. FORDHAM and HUNTER also discussed an ATF search warrant executed at AU's [JOHN JOHNSON's] house, and how it "ain't no coincidence[.]"

244. On or about March 24, 2021, KEVIN FORDHAM sold approximately half a pound of marijuana and 51.35 grams of cocaine base, which ZANIE TALIAFERRO supplied.

245. On or about March 24, 2021, during a recorded call, KEVIN FORDHAM discussed retaliation for the IIVL Chief's murder, and how he told an AVLN member to stop telling everyone that he is going to kill the defendant or the defendant's family. FORDHAM stated, "We gonna handle that shit, we gonna handle it right."

246. On or about March 24, 2021, during a recorded call, BRANDON THOMAS discussed selling heroin for \$55 a gram and arranged to sell an ounce the following day.

247. On or about March 25, 2021, BRANDON THOMAS sold approximately 32 grams of fentanyl.

248. On or about March 26, 2021, WINISFORD WATKINS possessed approximately 35 grams of cocaine, 3.4 grams of cocaine base, one pound of marijuana, one Beretta, model APX 9 mm pistol, loaded with nine rounds of ammunition, assorted 9 mm ammunition, and AVLN literature.

249. On or about March 29, 2021, during a recorded call, BRANDON THOMAS discussed selling another ounce of heroin and stated, "Alright, give me a minute, it will be like two days."

250. On or about March 31, 2021, during a recorded call, ANTHONY REYNOLDS discussed AVLN business, including being a member since 1997, his rank and history with various branches, and serving prison time because of his involvement in the AVLN. During the call, ANTHONY REYNOLDS stated, "I'm with straight Vice Lord. . . I done got shot for this shit, stabbed for this shit, did two prison bits for this shit, n----, for the lord as a whole." ANTHONY REYNOLDS also discussed how he had "Tweez" [ANTHONY NAJERA] beat up an AVLN

member and associate "in front of his family and everything, and made them say, respect Vice Lord." ANTHONY REYNOLDS also stated, "it's a known thing that an Elite is supposed to sacrificed they self (sic) for the mob. For the greater good. Even if that means to suicide bomb yourself n----, for the greater good of the mob."

251. On or about April 1, 2021, EDDIE REID, DELAINO EPPENGER, SPOONIE JOHNSON, and other AVLN members and associates attended the viewing for the deceased IIVL Chief, at James Cole Funeral Home in Detroit, Michigan.

252. On or about April 2, 2021, KEVIN FORDHAM, EDDIE REID, KURTEIZ THOMPSON, and other members and associates of the AVLN attended the funeral for the deceased IIVL Chief, at James Cole Funeral Home in Detroit, Michigan.

253. On or about April 4, 2021, during a recorded call, KEVIN FORDHAM discussed AVLN business with HARITH HUNTER. FORDHAM explained that, with Vice Lords, “[i]t’s always a confrontation. it ain’t nothing, it ain’t nothing never positive.” HUNTER explained that “[t]hem n----- bought guns and shit, talking about that shit [retaliation for the deceased IIVL Chief’s death]. That night talking bout, yeah n-----, we going--when he get out we lighting him up and his boy.” FORDHAM and HUNTER discussed “Kaos’s” [SPOONIE JOHNSON’s] behavior during the deceased IIVL Chief’s funeral viewing. FORDHAM later explained that the 5 Mile Insane were formed back at the end of 1995 or the beginning of 1996.

254. On or about April 5, 2021, during a recorded call, EDDIE REID confirmed that he placed an order for approximately 3 ounces of heroin and 1 ounce of cocaine.

255. On or about April 5, 2021, DEVAN TURNER-BANKHEAD sold approximately 10 grams of fentanyl.

256. On or about April 7, 2021, FABIAN TOODLE sold approximately 12 grams of pure methamphetamine.

257. On or about April 8, 2021, ANGELO HOPSON possessed with intent to distribute approximately two kilograms of cocaine.

258. On or about April 8, 2021, during a recorded call, EDDIE REID explained that law enforcement arrested ANGELO HOPSON with controlled substances. REID stated, “[T]hat was our shit.”

259. On or about April 9, 2021, during a recorded call, EDDIE REID discussed traveling on the Greyhound bus to Chicago to pick up replacement heroin and cocaine.

260. On or about April 10, 2021, during a recorded call, EDDIE REID discussed how ANGELO HOPSON was arrested with “three bricks” of fentanyl. REID explained, “N----, that’s a death sentence[.]” REID also stated that “E Lee” [EARNEST LEE] was the supplier.

261. On or about April 11, 2021, during a recorded call, BRANDON THOMAS discussed selling heroin after getting back into town and obtaining more heroin.

262. On or about April 13, 2021, during recorded calls, KEVIN FORDHAM discussed AVLN business with an AVLN member and associate, including whether an IVL member should be killed.

263. On or about April 14, 2021, during a recorded call, KEVIN FORDHAM explained, “Everybody in, in, in the whole world know, n-----, that Insanes run Detroit. Everybody know that shit.”

264. On or about April 14, 2021, during a recorded call, FABIAN TOODLE discussed selling drugs, including methamphetamine.

265. On or about April 16, 2021, during a recorded call, an AVLN member and associate asked for KEVIN FORDHAM’s help with replacing the leader of the IIVL branch. KEVIN

FORDHAM discussed arranging a meeting to decide who would take over the IIVL branch after the IIVL Chief's murder.

266. On or about April 17, 2021, during a recorded call, KEVIN FORDHAM and an AVLN member and associate discussed how the AVLN member was assaulted. FORDHAM offered assistance to retaliate, explaining, "Like I say, shit, let us, let me know then we'll take care of that shit."

267. On or about April 17, 2021, during a recorded call, KEVIN FORDHAM discussed coordinating and selecting who would take over for the deceased IIVL Chief. FORDHAM also explained that he was at ANTIONE COLEMAN's house.

268. On or about April 17, 2021, during a recorded meeting, DELAINO EPPENGER, EDDIE REID, and other AVLN members and associates, discussed AVLN business, including that an AVLN member had recently been arrested in possession of drugs and firearms. EDDIE REID issued a warning that

members should not keep “dirty ones” (guns used in illegal activity) in their homes. EDDIE REID stated, “We store the guns over there and shit...then we just pick them bitches up then we go handle our business.” AVLN members also discussed that a recently ex-communicated member needed to be located and that “he need (sic) to be gone.”

269. On or about April 18, 2021, during a recorded call, FABIAN TOODLE discussed selling methamphetamine but would need a couple of days.

270. On or about April 19, 2021, during a recorded call, BRANDON THOMAS explained that he is the “Chief Enforcer over the Nation, right under P.”

271. On or about April 19, 2021, during a recorded call, FABIAN TOODLE discussed selling methamphetamine, including arranging a meeting with his supplier.

272. On or about April 20, 2021, JAVON WILHITE possessed an AR-style rifle, a 9 mm handgun, and marijuana.

273. On or about April 20, 2021, during a recorded call, FABIAN TOODLE discussed obtaining additional methamphetamine from his supplier.

274. On or about April 21, 2021, during a recorded call, KEVIN FORDHAM discussed who would take over as IIVL Chief after the former Chief's murder and shut down the possibility of another AVLN member's plans for who would become the new IIVL Chief.

275. On or about April 24, 2021, during a recorded call, KEVIN FORDHAM discussed which AVLN members assaulted a female AVLN member. FORDHAM stated that he was going to find out where one of the AVLN members was at so he could "knock his top off." KEVIN FORDHAM acknowledged overseeing the Board. FORDHAM also discussed AVLN business, including FORDHAM giving rank to an AVLN member and associate.

276. On or about April 24, 2021, during a recorded call, KEVIN FORDHAM discussed AVLN business with an AVLN member and associate, including scheduling a gang meeting so FORDHAM could attend and mediate issues within the deck.

277. On or about April 24, 2021, during a recorded call, KEVIN FORDHAM and WINISFORD WATKINS discussed AVLN business, including gang leadership and drug trafficking. FORDHAM and WATKINS also discussed recent law enforcement searches of AVLN members and associates, like JOHN JOHNSON, and how the police were hitting several AVLN members' houses.

278. On or about April 25, 2021, during a recorded call, KEVIN FORDHAM and HARITH HUNTER discussed AVLN business, including the rumor that an AVLN member and associate cooperated with law enforcement, as well as AVLN rank and gang leadership.

279. On or about April 26, 2021, KEVIN FORDHAM sold approximately 55.55 grams of cocaine hydrochloride.

280. On or about April 26, 2021, HARITH HUNTER sold approximately 23.72 grams of cocaine base.

281. On or about May 14, 2021, KEVIN FORDHAM sold approximately 55.7 grams of cocaine hydrochloride and half a pound of marijuana.

282. On or about May 14, 2021, HARITH HUNTER sold approximately 24.07 grams of cocaine base.

283. On or about May 14, 2021, ANTIONE COLEMAN sold approximately 1 ounce of marijuana.

284. On or about May 14, 2021, SPOONIE JOHNSON delivered approximately .1806 grams of cocaine hydrochloride.

Notice of Acts with Special Sentencing Factors

1. On or about April 5, 2020, in the Eastern District of Michigan, enterprise members TERRY DOUGLAS, DAVUN BASKERVILLE, and others known and unknown to the Grand Jury, aided and abetted by each other, committed an act involving murder, that is, murdering J.G., perpetrated by means of lying in wait, and any other willful, deliberate, and premeditated killing, all in violation of Michigan Compiled Laws Sections 750.316, 750.317, 750.157a, and 767.39.
2. On or about April 5, 2020, in Eastern District of Michigan of Michigan, enterprise members DAVUN BASKERVILLE, and others known and unknown to the Grand Jury, aided and abetted by each other, committed an act involving murder, that is, assaulting K.C. with the intent to commit murder, in violation of Michigan Compiled Laws Sections 750.83, 750.157a, and 767.39.

3. On or about October 17, 2016, in the Eastern District of Michigan and elsewhere, enterprise members TERRY DOUGLAS, and others known and unknown to the Grand Jury, aided and abetted by each other, committed an act involving murder, that is, assaulting H.S. with the intent to commit murder, in violation of Michigan Compiled Laws Sections 750.83, 750.157a, and 767.39.
4. On or about July 27, 2017, in the Eastern District of Michigan and elsewhere, enterprise members KENNETH JOHNSON, ANTHONY ZIGLER, and others known and unknown to the Grand Jury, aided and abetted by each other, committed an act involving murder, that is, assaulting F.W. with the intent to commit murder, in violation of Michigan Compiled Laws Sections 750.83, 750.157a, and 767.39.

5. On or about February 13, 2020, in the Eastern District of Michigan and elsewhere, enterprise members ANTHONY SIMMONS, and others known and unknown to the Grand Jury, aided and abetted by each other, committed an act involving murder, that is, assaulting O.J. with the intent to commit murder, in violation of Michigan Compiled Laws Sections 750.83, 750.157a, and 767.39.

6. Beginning on a date unknown to the Grand Jury, but starting no later than 2012, until the date of the Indictment, in the Eastern District of Michigan and elsewhere, enterprise members KEVIN FORDHAM, TAMAR WATKINS, TERRY DOUGLAS, GREGORY JOHNSON, SPOONIE JOHNSON, KURTEIZ THOMPSON, JAVON WILHITE, SCHUYLER BELEW JR., GARY PORTER, LAWON CARTER, ANTHONY REYNOLDS, JAYLIN MCNEAL, ANTHONY NAJERA, NAUJEH CARTER, TYRONE FISHER, FABIAN TOODLE, BRANDON THOMAS, KENNETH JOHNSON, WINISFORD WATKINS, and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated, and agreed with each other and with persons both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to possess with intent to distribute and to distribute at least 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, at least 500

grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 841(b)(1)(D), and 846.

7. Beginning on a date unknown to the Grand Jury, but starting no later than 2012, and continuing through on or about the date of this Indictment, in the Eastern District of Michigan, and elsewhere, defendants, KEVIN FORDHAM, MARTIN MURFF, EDDIE REID, EARNEST LEE, DELAINO EPPENGER, DEVAN TURNER-BANKHEAD, ANGELO HOPSON, and other persons known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated, and agreed with together and with each other, and with other persons known and unknown to the Grand Jury, to distribute and to possess with intent to distribute at least 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, at least 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, a Schedule I controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(A), 841(b)(1)(D), and 846.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT 2

Assault with Dangerous Weapon in Aid of Racketeering
18 U.S.C. §§ 1959(a)(3), 2

D-25 Kenneth Johnson
D-28 Anthony Zigler

1. Paragraphs 1 through 30 of Count One of this Indictment, are re-alleged and incorporated by reference as though set forth fully herein. The AVLN, including its leadership, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce ("The Enterprise"). The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

2. At all times relevant to this Indictment, the above-described Enterprise, through its members, leaders, and associates, engaged in racketeering activity as defined by Title 18, United States Code, Section 1961(1), namely acts involving murder, in violation of Michigan law, offenses involved in trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846, witness intimidation, in violation of Title 18, United States Code, Sections 1512 and 1513, interference with commerce by threats or violence, in violation of Title 18, United States Code, Section 1951, and interstate and foreign travel in aid of racketeering, in violation of Title 18, United States Code, Section 1952.

3. On or about July 27, 2017, in the Eastern District of Michigan, and elsewhere, ANTHONY ZIGLER, KENNETH JOHNSON, and others known and unknown to the Grand Jury, aided and abetted by each other, for the purpose of gaining entrance to, maintaining and increasing position in the AVLN, an enterprise engaged in racketeering activity, knowingly assaulted F.W. with a

dangerous weapon, in violation of Michigan Compiled Laws Sections 750.82, 750.157a, and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and (2).

COUNT 3

Assault with Dangerous Weapon in Aid of Racketeering
18 U.S.C. §§ 1959(a)(3), 2

D-27 Anthony Simmons

D-29 Shelton Carter

D-30 Artise Johnson

1. Paragraphs 1 through 30 of Count One of this Indictment, are re-alleged and incorporated by reference as though set forth fully herein. The AVLN, including its leadership, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce ("The Enterprise"). The Enterprise constituted an ongoing organization whose members

functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the above-described Enterprise, through its members, leaders, and associates, engaged in racketeering activity as defined by Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts involving murder, robbery, and extortion, in violation of Michigan law, offenses involved in trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846, witness intimidation, in violation of Title 18, United States Code, Sections 1512 and 1513, interference with commerce by threats or violence, in violation of Title 18, United States Code, Section 1951, and interstate and foreign travel in aid of racketeering, in violation of Title 18, United States Code, Section 1952.

3. On or about February 13, 2020, in the Eastern District of Michigan, and elsewhere, ANTHONY SIMMONS, SHELTON CARTER, ARTISE JOHNSON, and others known and unknown to

the Grand Jury, aided and abetted by each other, for the purpose of gaining entrance to, maintaining and increasing position in the AVLN, an enterprise engaged in racketeering activity, knowingly assaulted O.J. with a dangerous weapon, in violation of Michigan Compiled Laws Sections 750.82, 750.157a, and 767.39.

All in violation of Title 18. United States Code, Sections 1959(a)(3) and (2).

COUNT 4
Conspiracy to Distribute Controlled Substances
21 U.S.C. § 846

D-1 KEVIN FORDHAM,
D-3 TAMAR WATKINS,
D-4 TERRY DOUGLAS,
D-6 GREGORY JOHNSON,
D-7 SPOONIE JOHNSON,
D-8 KURTEIZ THOMPSON,
D-9 JAVON WILHITE,
D-10 SCHUYLER BELEW JR.,
D-12 GARY PORTER,
D-13 LAWON CARTER,
D-14 ANTHONY REYNOLDS,
D-15 JAYLIN MCNEAL,
D-16 ANTHONY NAJERA,
D-17 NAUJEH CARTER,
D-18 TYRONE FISHER,

D-19 FABIAN TOODLE,
D-24 BRANDON THOMAS,
D-25 KENNETH JOHNSON,
D-26 WINISFORD WATKINS,
D-31 DWAYNE PARLER
D-32 LATEEF MOORE,
D-33 CHARLES DOUGLAS,
D-34 JOHN JOHNSON,
D-35 ZANIE TALIAFERRO,
D-36 ANTIONE COLEMAN,
D-37 HARITH HUNTER,
D-38 ONDROME LEWIS,
D-39 RASEAN WALKER,

Beginning in or around 2016, the exact date being unknown to the
Grand Jury, and continuing through on or about the date of this
Indictment, in the Eastern District of Michigan, and elsewhere,
defendants,

KEVIN FORDHAM,
TAMAR WATKINS,
TERRY DOUGLAS,
GREGORY JOHNSON,
SPOONIE JOHNSON,
KURTEIZ THOMPSON,
JAVON WILHITE,
SCHUYLER BELEW JR.,
GARY PORTER,
LAWON CARTER,
ANTHONY REYNOLDS,
JAYLIN MCNEAL,

ANTHONY NAJERA,
NAUJEH CARTER,
TYRONE FISHER,
FABIAN TOODLE,
BRANDON THOMAS,
KENNETH JOHNSON,
WINISFORD WATKINS,
DWAYNE PARLER,
LATEEF MOORE,
CHARLES DOUGLAS,
JOHN JOHNSON,
ZANIE TALIAFERRO,
ANTIONE COLEMAN,
HARITH HUNTER,
ONDROME LEWIS,
RASEAN WALKER,

knowingly conspired and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to distribute at least 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, at least 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, at least 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture or substance containing a detectable amount of

cocaine, a Schedule II controlled substance, a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a detectable amount of marijuana, a Schedule I controlled substance, in violation Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 841(b)(1)(D), and 846.

With respect to defendants KEVIN FORDHAM, TAMAR WATKINS, TERRY DOUGLAS, SPOONIE JOHNSON, JAVON WILHITE, SCHUYLER BELEW JR., GARY PORTER, LAWON CARTER, ANTHONY REYNOLDS, JAYLIN MCNEAL, ANTHONY NAJERA, NAUJEH CARTER, TYRONE FISHER, FABIAN TOODLE, KENNETH JOHNSON, WINISFORD WATKINS, DWAYNE PARLER, LATEEF MOORE CHARLES DOUGLAS, JOHN JOHNSON, GREGORY JOHNSON, and KURTEIZ THOMPSON, the amount of controlled substances involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is at least 280 grams or more of cocaine base, a Schedule II controlled substance, at least 500 grams or more of

methamphetamine, a Schedule II controlled substance, and at least 100 grams or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1)(i), (iii), and (viii).

With respect to defendants BRANDON THOMAS, ZANIE TALIAFERRO, ANTIONE COLEMAN, and HARITH HUNTER, the amount of controlled substances involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is at least 280 grams or more of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1)(iii).

COUNT 5
Conspiracy to Distribute Controlled Substances
21 U.S.C. § 846

D-1 KEVIN FORDHAM
D-2 MARTIN MURFF
D-5 EDDIE REID
D-20 EARNEST LEE
D-21 DELAINO EPPENGER
D-22 DEVAN TURNER-BANKHEAD
D-23 ANGELO HOPSON
D-40 DARRYL TAYLOR

Beginning in or around 2018, the exact date being unknown to the Grand Jury, and continuing through on or about the date of this Indictment, in the Eastern District of Michigan, and elsewhere, defendants,

KEVIN FORDHAM,
MARTIN MURFF,
EDDIE REID,
EARNEST LEE,
DELAINO EPPENGER,
DEVAN TURNER-BANKHEAD,
ANGELO HOPSON,
DARRYL TAYLOR,

knowingly conspired and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to distribute at least 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, at least 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a detectable amount of

marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(D), and 846.

With respect to defendants KEVIN FORDHAM, MARTIN MURFF, EDDIE REID, EARNEST LEE, DELAINO EPPENGER, DEVAN TURNER-BANKHEAD, ANGELO HOPSON, and DARRYL TAYLOR, the amount of controlled substances involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 400 grams or more of a mixture or substance containing a detectable amount of fentanyl (a Schedule II controlled substance), 1 kilogram or more of a mixture and substance containing a detectable amount of heroin (a Schedule I controlled substance), and 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine (a Schedule II controlled substance), in violation of Title 21, United States Code, Section 841(b)(1)(A)(i), (ii), and (vi).

COUNT 6

Distribution of Controlled Substances
21 U.S.C. § 841

D-4 TERRY DOUGLAS

On or about September 15, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, knowingly distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime
18 U.S.C. §§ 924(c), 2

D-4 TERRY DOUGLAS

On or about September 15, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, and others known and unknown to the Grand Jury, aided and abetted by each other,

knowingly carried and used a firearm during and in relation to a drug trafficking crime for which TERRY DOUGLAS may be prosecuted in a court of the United States, specifically, Distribution of Controlled Substances, (as more particularly described in Count 6 of this Indictment), in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 8
Distribution of Controlled Substances
21 U.S.C. § 841

D-4 TERRY DOUGLAS

On or about September 22, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, and others known and unknown to the Grand Jury, knowingly distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

Using and Carrying a Firearm During and in Relation to

a Drug Trafficking Crime

18 U.S.C. §§ 924(c), 2

D-4 TERRY DOUGLAS

On or about September 22, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly carried and used a firearm during and in relation to a drug trafficking crime for which TERRY DOUGLAS may be prosecuted in a court of the United States, specifically, Distribution of Controlled Substances, (as more particularly described in Count 8 of this Indictment), in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 10

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-4 TERRY DOUGLAS

On or about November 13, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) Ruger, EC9S, 9mm caliber pistol, serial number 457-93693

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 11

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841

D-4 TERRY DOUGLAS

On or about November 13, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, knowingly possessed with the intent to distribute a mixture or substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-4 TERRY DOUGLAS

On or about November 13, 2020, in the Eastern District of Michigan, defendant TERRY DOUGLAS, knowingly possessed the following firearm:

- One (1) Ruger, EC9S, 9mm caliber pistol, serial number 457-93693

in furtherance of a drug trafficking crime for which TERRY DOUGLAS

may be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances (as more particularly described in Count 11 of this Indictment), in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 13
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-9 JAVON WILHITE

On or about November 6, 2020, in the Eastern District of Michigan, defendant JAVON WILHITE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, that are:

- One (1) Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 16381336, and
- One (1) Anderson Manufacturing, AM-15, multi-caliber rifle, serial number 18031643

said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 14

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-9 JAVON WILHITE

On or about November 9, 2020, in the Eastern District of Michigan, defendant JAVON WILHITE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) Norinco, MAK-90 Sporter, 7.62 caliber, semi-automatic rifle, serial number 94122633

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 15

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-9 JAVON WILHITE

On or about April 20, 2021, in the Eastern District of Michigan, defendant JAVON WILHITE, knowing that he had been previously

convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, that are:

- One (1) Mega Arms, Gator model, multi-caliber rifle, serial number MUR20556
- One (1) Smith and Wesson, Model M&P Shield, 9mm pistol, serial number NEY9557
- One (1) Springfield Armory, XD9, 9mm pistol, serial number S3612911

said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 16

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-9 JAVON WILHITE

On or about April 20, 2021, in the Eastern District of Michigan, defendant JAVON WILHITE, knowingly possessed the following firearms:

- One (1) Mega Arms, Gator model, multi-caliber rifle, serial number MUR20556

- One (1) Smith and Wesson, Model M&P Shield, 9mm pistol, serial number NEY9557
- One (1) Springfield Armory, XD9, 9mm pistol, serial number S3612911

in furtherance of a drug trafficking crime for which JAVON WILHITE may be prosecuted in a court of the United States, specifically, Conspiracy to Distribute Controlled Substances (as more particularly described in Count 4 of this Indictment); in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 17
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-13 LAWON CARTER

On or about September 5, 2019, in the Eastern District of Michigan, defendant LAWON CARTER, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) CN Romarm 7.62 x 39 mm caliber rifle, model GPWASR 10/62, serial number: RF2-108-86

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 18

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841(a)(1)

D-13 LAWON CARTER

From on or about July 16, 2019, through on or about September 5, 2019, in the Eastern District of Michigan, defendant LAWON CARTER, knowingly possessed with the intent to distribute at least 28 grams of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

COUNT 19

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-13 LAWON CARTER

From on or about July 16, 2019, through on or about September 5, 2019, in the Eastern District of Michigan, defendant LAWON CARTER, knowingly possessed the following firearm:

- One (1) CN Romarm 7.62 x 39 mm caliber rifle, model GPWASR 10/62, serial number: RF2-108-86

in furtherance of a drug trafficking crime for which LAWON CARTER may be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances, (as more particularly described in Count 18 of this Indictment), in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 20

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-13 LAWON CARTER

On or about September 5, 2019, in the Eastern District of

Michigan, defendant LAWON CARTER, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, that are:

- One (1) Diamondback Firearms, AR Style Pistol, Caliber: Multi, Model: DB-15, SN: DB1738912
- One (1) Norinco, 7.62 Caliber Rifle, Model: MAK-90, SN: 9494998

said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 21

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841(a)(1)

D-13 LAWON CARTER

From on or about July 16, 2019, through on or about September 5, 2019, in the Eastern District of Michigan, defendant LAWON CARTER, knowingly possessed with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II

controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 22

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-13 LAWON CARTER

From on or about July 16, 2019, through on or about September 5, 2019, in the Eastern District of Michigan, defendant LAWON CARTER, knowingly possessed the following firearms:

- One (1) Diamondback Firearms, AR Style Pistol, Caliber: Multi, Model: DB-15, SN: DB1738912
- One (1) Norinco, 7.62 Caliber Rifle, Model: MAK-90, SN: 9494998

in furtherance of a drug trafficking crime for which LAWON CARTER may be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances, (as more particularly described in Count 21 of this Indictment), in violation of

Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 23
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-21 DELAINO EPPENGER

On or about November 4, 2020, in the Eastern District of Michigan, defendant DELAINO EPPENGER, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) Kel-Tec model RFB, 7.62 caliber rifle

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 24

Distribution of Controlled Substances
21 U.S.C. § 841, 18 U.S.C. § 3147

D-21 DELAINO EPPENGER

On or about December 29, 2020, in the Eastern District of Michigan, defendant DELAINO EPPENGER, knowingly distributed a mixture or substance containing Oxycodone, a Schedule II controlled substance.

Defendant DELAINO EPPENGER committed the offense charged in this Count while released under Title 18, United States Code, Chapter 207, and pending trial in the Eastern District of Michigan, Criminal Case Number 5:21-cr-20003.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 3147(1).

COUNT 25

Distribution of Controlled Substances
21 U.S.C. § 841, 18 U.S.C. §§ 2, 3147

D-5 EDDIE REID
D-21 DELAINO EPPENGER

On or about January 14, 2021, in the Eastern District of Michigan, defendants DELAINO EPPENGER, EDDIE REID, and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly distributed a mixture or substance containing heroin, a Schedule I controlled substance.

Defendant DELAINO EPPENGER committed the offense charged in this Count while released under Title 18, United States Code, Chapter 207, and pending trial in the Eastern District of Michigan, Criminal Case Number 5:21-cr-20003.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Sections 3147(1) and 2.

COUNT 26

Distribution of Controlled Substances
21 U.S.C. § 841, 18 U.S.C. §§ 2, 3147

D-5 EDDIE REID
D-21 DELAINO EPPENGER

On or about January 26, 2021, in the Eastern District of Michigan, defendants DELAINO EPPENGER, EDDIE REID, and others known and unknown to the Grand Jury, aided and abetted by each other, knowingly distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

Defendant DELAINO EPPENGER committed the offense charged in this Count while released under Title 18, United States Code, Chapter 207, and pending trial in the Eastern District of Michigan, Criminal Case Number 5:21-cr-20003.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Sections 3147(1) and 2.

COUNT 27

Possession with Intent to Distribute Controlled Substances

21 U.S.C. § 841(a)(1), 18 U.S.C. §§ 2, 3147

D-5 EDDIE REID
D-21 DELAINO EPPENGER
D-23 ANGELO HOPSON

On or about February 5, 2021, in the Eastern District of Michigan, defendants EDDIE REID, DELAINO EPPENGER, and ANGELO HOPSON, knowingly possessed with the intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Defendant DELAINO EPPENGER committed the offense charged in this Count while released under Title 18, United States Code, Chapter 207, and pending trial in the Eastern District of Michigan, Criminal Case Number 5:21-cr-20003.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 3147(1).

COUNT 28
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-26 WINISFORD WATKINS

On or about March 26, 2021, in the Eastern District of Michigan, defendant WINISFORD WATKINS, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) Beretta, model APX, 9mm pistol, serial number: A066852X

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 29

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841

D-26 WINISFORD WATKINS

On or about March 26, 2021, in the Eastern District of Michigan, defendant WINISFORD WATKINS, knowingly possessed with intent to distribute a mixture or substance containing cocaine, a Schedule II controlled substance, a mixture or substance containing cocaine base, a Schedule II controlled substance, and a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 30

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-26 WINISFORD WATKINS

On or about March 26, 2021, in the Eastern District of Michigan, defendant WINISFORD WATKINS, knowingly possessed the following firearm:

- One (1) Beretta, model APX, 9mm pistol, serial number: A066852X

in furtherance of a drug trafficking crime for which WINISFORD WATKINS may be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances (as more particularly described in Count 29 of this Indictment); in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 31
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-34 JOHN JOHNSON

On or about January 20, 2021, in the Eastern District of Michigan, defendant JOHN JOHNSON, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, that are:

- One (1) Smith & Wesson, 38 Model 925 revolver, serial number AD88791,

- One (1) Spike's Tactical Model ST-15, AR-style pistol, serial number P000008, and
- One (1) Smith & Wesson SD40 VE pistol, serial number FCK4518,

said firearms having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 32

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841

D-34 JOHN JOHNSON

On or about January 20, 2021, in the Eastern District of Michigan, defendant JOHN JOHNSON, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 33

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-34 JOHN JOHNSON

On or about January 20, 2021, in the Eastern District of Michigan, and elsewhere, defendant JOHN JOHNSON, knowingly possessed the following firearms:

- One (1) Smith & Wesson, 38 Model 925 revolver, serial number AD88791
- One (1) Spike's Tactical Model ST-15, AR-style pistol, serial number P000008
- One (1) Smith & Wesson SD40 VE pistol, serial number FCK4518

in furtherance of a drug trafficking crime for which JOHN JOHNSON may be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances (as more particularly described in Count 32 of this Indictment); in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 34
Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-6 GREGORY JOHNSON

On or about June 4, 2020, in the Eastern District of Michigan, defendant GREGORY JOHNSON, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is:

- One (1) Kahr Arms Model CW45, .45 caliber pistol, serial number: SE0688

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 35

Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 841

D-6 GREGORY JOHNSON

On or about June 16, 2020, in the Eastern District of Michigan, defendant GREGORY JOHNSON, knowingly possessed with intent to distribute a mixture or substance containing heroin, a Schedule I controlled substance, a mixture or substance containing fentanyl, a Schedule II controlled substance, and a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 36

Felon in Possession of a Firearm
18 U.S.C. § 922(g)(1)

D-6 GREGORY JOHNSON

On or about June 16, 2020, in the Eastern District of Michigan, defendant GREGORY JOHNSON, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding

one year, knowingly possessed a firearm, that is:

- One (1) Smith & Wesson, model M&P 15, .223 caliber rifle, serial number: SU41045

said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 37

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-6 GREGORY JOHNSON

On or about June 16, 2020, in the Eastern District of Michigan, defendant GREGORY JOHNSON, knowingly possessed the following firearm:

- One (1) Smith & Wesson, model M&P 15, .223 caliber rifle in furtherance of a drug trafficking crime for which JOHN JOHNSON or about May be prosecuted in a court of the United States, specifically, Possession with Intent to Distribute Controlled Substances (as more

particularly described in Count 35 of this Indictment); in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 38

Distribution of Controlled Substances
21 U.S.C. § 841

D-33 CHARLES DOUGLAS

On or about December 15, 2020, in the Eastern District of Michigan, defendant CHARLES DOUGLAS, knowingly distributed at least 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 39

Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime
18 U.S.C. § 924(c)

D-33 CHARLES DOUGLAS

On or about December 15, 2020, in the Eastern District of

Michigan, defendant CHARLES DOUGLAS, knowingly used and carried the following firearm:

- One (1) Glock pistol

during and in relation to a drug trafficking crime for which CHARLES DOUGLAS may be prosecuted in a court of the United States, specifically, Distribution of Controlled Substances (as more particularly described in Count 38 of this Indictment); in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

Notice of Acts with Enhanced Sentencing

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant MARTIN MURFF committed the offenses charged in Count 5 of this Indictment, MARTIN MURFF had a final conviction for a serious violent felony, namely, Homicide-Murder, in Case No. 89CR1935003, in Cook County Circuit Court, in Chicago, Illinois, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before the defendant TAMAR WATKINS committed the offenses charged in Count 4 of this Indictment, TAMAR WATKINS had a final conviction for a serious violent felony, namely, Homicide, in Case No. 97113043901, in Cook County Circuit Court in Chicago, Illinois, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before the defendant TERRY DOUGLAS committed the offenses charged in Counts 4, 6, 8, and 11, of this

Indictment, TERRY DOUGLAS had at least two final convictions for serious violent felonies, namely, Unarmed Robbery, in Case No. 01-005443-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment; and Armed Robbery, in Case No. 01-005450-02, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant EDDIE REID committed the offenses charged in Count 5 of this Indictment, EDDIE REID had a final conviction for a serious violent felony, namely, Unarmed Robbery, in Case No. 07-021546-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before the defendant GREGORY JOHNSON committed the offenses charged in Counts 4 and 35 of this Indictment, GREGORY JOHNSON had a final conviction for a serious violent felony, namely, Assault with a Dangerous Weapon and Carjacking, in

Case No. 01-010099-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months; and had a final conviction for a serious drug felony, namely, Controlled Substance – Delivery/Manufacture Less than 50 Grams of Cocaine, in Case No. 99-008504-02, for which he served more than 12 months of imprisonment and was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before the defendant SPOONIE JOHNSON committed the offenses charged in Count 4 of this Indictment, SPOONIE JOHNSON had a final conviction for a serious violent felony, namely, Criminal Sexual Conduct in the First Degree, Armed Robbery, and Carjacking, in Case No. 95-006678-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant NAUJEH CARTER committed

the offenses charged in Count 4 of this Indictment, NAUJEH CARTER had a final conviction for a serious violent felony, namely, Carjacking, in Case No. 2015-256101-FC, in the 6th Circuit Court in Pontiac, Michigan, for which she served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant TYRONE FISHER committed the offenses charged in Count 4 of this Indictment, TYRONE FISHER had two final convictions for serious drug trafficking felonies, namely, Dealing in Cocaine or Narcotic Drugs, in Case No. 45G01-1302-FA00005, in Lake County, Indiana, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and Dealing in Cocaine or Narcotic Drugs, in Case No. 45G01-1302-FA00005, in Lake County, Indiana, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant FABIAN TOODLE committed the offenses charged in Count 4 of this Indictment, FABIAN TOODLE had a final conviction for a serious violent felony, namely, Assault with Intent to Commit Great Bodily Harm, in Case No. 00-1467-FC, in the 22nd Circuit Court in Ann Arbor, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant EARNEST LEE committed the offenses charged in Count 5 of this Indictment, EARNEST LEE had two final convictions for serious violent felonies, namely, Armed Robbery-Armed with a Firearm, in Case No. 01CR0130801, in Cook County Circuit Court in Chicago, Illinois, for which he served more than 12 months of imprisonment, and Armed Robbery, in Case No. 01CR0130901, in Cook County Circuit Court in Chicago, Illinois, for which he served more than 12 months of imprisonment, and a final conviction for a serious drug felony, namely, Narcotics – Possession with Intent to Distribute –

Felony, Case No. 09-cr-186, in the United States District Court for the Eastern District of Wisconsin, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant DELAINO EPPENGER committed the offenses charged in Counts 5, 24, 25, 26, 27, of this Indictment, DELAINO EPPENGER had a final conviction for a serious violent felony, namely, Armed Robbery, in Case No. 13-011198-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant DEVAN TURNER-BANKHEAD committed the offenses charged in Count 5 of this Indictment, DEVAN TURNER-BANKHEAD had a final conviction for a serious violent felony, namely, Criminal Sexual Conduct-3rd Degree, in

Case No. 05-004961-01, in the 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before defendant ANGELO HOPSON committed the offenses charged in Counts 5 and 27 of this Indictment, ANGELO HOPSON had three final convictions for serious drug trafficking felonies, namely, Manufacture/Delivery of Controlled Substances 1-15 Grams Narcotics – Felony, Case No. 2004CR261040, in Cook County Circuit Court in Chicago, Illinois, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, Manufacture/Delivery of Controlled Substances More than 15 Grams Narcotics – Felony, Case No. 2005CR233201, in DuPage County Circuit Court in Wheaton, Illinois, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense, and

Manufacture/Delivery of Controlled Substances More than 15 Grams Narcotics – Felony, Case No. 2015CR0683401, in Cook County Circuit Court in Chicago, Illinois, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

Pursuant to Title 21, United States Code, Sections 841 and 851, the Grand Jury finds that before the defendant KENNETH JOHNSON committed the offenses charged in Count 4 of this Indictment, KENNETH JOHNSON had a final conviction for a serious violent felony, namely, Armed Robbery, in Case No. 07-003631-01, in 3rd Circuit Court in Detroit, Michigan, for which he served more than 12 months of imprisonment.

Forfeiture

The allegations contained in Counts 1-39 of this Indictment are hereby incorporated for reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §§ 924(d), 1963(a), 21 U.S.C. § 853, and 28 U.S.C.

§ 2461.

Pursuant to 18 U.S.C. § 1963(a)(1) through (3), upon conviction of the offense set forth in Count One of this Indictment, in violation of 18 U.S.C. § 1962(d), the convicted defendant(s) shall forfeit to the United States any interest the person has acquired or maintained in violation of 18 U.S.C. § 1962; any interest acquired or maintained in violation of Section 1962; and any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise has established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Section 1962.

Pursuant to 18 U.S.C. § 924(d) together with 28 U.S.C. § 2461, upon conviction of the offense(s) set forth in Counts 7, 9, 10, 12, 13, 14, 15, 16, 17, 19, 20, 22, 23, 28, 30, 31, 33, 34, 36, 37, and 39, of this Indictment, in violation of 18 U.S.C. §§ 922(g) and 924(c), the convicted

defendant(s) shall forfeit to the United States any firearm or ammunition involved in or used in his knowing violation of section 924.

Pursuant to 21 USC § 853(a), upon conviction of the offense(s) set forth in Counts 4, 5, 6, 8, 11, 18, 21, 24, 25, 26, 27, 29, 32, 35, and 38, of this Indictment, in violation of 21 U.S.C. §§ 841, 846, the convicted defendant(s) shall forfeit to the United States any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

Pursuant to 21 U.S.C. § 853(p), and 18 U.S.C. § 1963(m), as incorporated by 18 U.S.C. § 2253(b), the defendant(s) shall forfeit substitute property, up to the value of the property described above, if, by any act or omission of the defendant(s), the property described above: cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished

in value; or has been commingled with other property which cannot be divided without difficulty.

Such property includes, but is not limited to, a money judgment in an amount to be determined, representing the proceeds the defendant(s) obtained as a result of such violation.

THIS IS A TRUE BILL.

s/ *Grand Jury Foreperson*
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

CRAIG WININGER
Chief, Violent and Organized Crime Unit

s/ *Danielle Asher*
DANIELLE ASHER
BLAKE HATLEM
BRANT COOK
Assistant United States Attorneys

Dated: May 26, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number:
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	19-cr-20680 20-cr-20278 21-cr-20003
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Kevin Fordham

County where offense occurred: Wayne

Offense Type: Felony

Indictment-- no prior complaint

Superseding Case Information

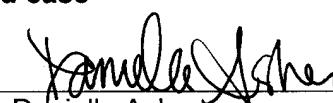
Superseding to Case No: _____ Judge: _____

Reason:

<u>Defendant Name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorneys are the attorneys of record for the above captioned case

5/26/21
Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.